

## Representation - Draft Modification Report UNC 0809S

### Distribution of Last Resort Supplier Payment (LRSP) claims to include IGT sites

Responses invited by: **5pm on 12 August 2022**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Brandon Rodrigues
<b>Organisation:</b>	ES Pipelines
<b>Date of Representation:</b>	12 <sup>th</sup> August 2022
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	c) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	a) Positive

#### Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

We support this modification as it will treat all gas customers equally, regardless of whether they are on an IGT or large transporter network. This will lead to more equitable treatment within a long term solution that is in line with Ofgem's intent in the open letter issued for recovery of LRSP costs from IGTs.

#### Self-Governance Statement: Please provide your views on the self-governance statement.

Yes, we agree that this modification satisfies the criteria for self-governance.

#### Implementation: What lead-time do you wish to see prior to implementation and why?

We agree that implementation should be 1<sup>st</sup> April 2023 to align with the next DN charging year.

#### Impacts and Costs: What analysis, development and ongoing costs would you face?

We would not face any costs from the implementation of this modification.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes, we are confident that the proposed legal text delivers the intent of the solution.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

We have not identified any errors or omissions for consideration in this modification report.

**Please provide below any additional analysis or information to support your representation**

No further comments.