

Representation - Draft Modification Report UNC 0831 0831A
0831 – Allocation of LDZ UIG to Shippers Based on a Straight Throughput Method

0831A - Allocation of LDZ UIG to Shippers (Class 2, 3 and 4) Based on a Straight Throughput Method

Responses invited by: 5pm on 19 October 2023

To: enquiries@gasgovernance.co.uk

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

Representative:	Sarah Barry
Organisation:	Gas Plus Supply Ltd (Utility Warehouse)
Date of Representation:	19 October 2023
Support or oppose implementation?	0831 - Oppose 0831A - Oppose
Alternate preference:	<i>If either 0831 or 0831A were to be implemented, which would be your preference?</i> Not Applicable
Relevant Objective:	d) Negative f) None
Relevant Charging Methodology Objective:	Not Applicable

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

Gas consumption on smart meters is measured accurately and does not contribute to UIG levels. Allocating UIG irrespective of a supplier's level of smart meter penetration, as proposed in both 0831/0831A, is unjust and would remove a commercial incentive for suppliers to deliver the smart meter rollout. Penalising Class 3 meters does not allocate UIG fairly given that they do not contribute to UIG error or volatility. The current UIG allocation methodology that incorporates the level of smart meter penetration, and applies the 'Polluter Pays' principle, is fit for purpose, and should remain in place. Removal of the AUGE would result in UIG being allocated less accurately and less fairly, and therefore would contradict Relevant Objective (d) in securing fair and effective competition between relevant suppliers.

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

Not Applicable

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

Not Applicable

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

Not Applicable

Modification Panel Members have requested that the following questions are addressed:

Q1: Do you have views on the effect of these two alternatives on end consumers?

This will not have any effect on end consumers.

Q2: Is the process in electricity comparable? (please explain)

No

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.*

No

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