**Joint Office** of Gas Transporters

## Representation - Modification UNC 0724 (Urgent)

## Amendment to Ratchet charges during COVID-19 period

### Responses invited by: **1pm on 27 April 2020**

**To:** enquiries@gasgovernance.co.uk

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

| | |
|---|---|
| **Representative**: | Lorna Lewin |
| **Organisation:** | Orsted |
| **Date of Representation:** | 27 April 2020 |
| **Support or oppose implementation?** | Support |
| **Relevant Objective:** | **a)** Positive |

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

Due to the COVID-19 pandemic, some sites have or will exceed their anticipated gas use by increase production to provide support to the pandemic. Due to the current ratchet regime rules these sites will be penalised for doing so. This modification provides a pragmatic solution to reduce associated costs and introduces a first step to removing this potential disincentive.

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

We would support an implementation as soon as possible to provide certainty to customers they will not face excessive charges for increased production due to COVID-19 requirements.

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

We have not fully assessed the impacts and costs to our business but expect them to be minimal.

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

We have reviewed the legal text and have identified a drafting error in 5.1(b) which refers to UNC TPD B4.8.4.3 and we believe it should refer to UNC TPD B4.7.8

**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.*

None identified.

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

None.