

Representation

Draft Modification Report

Modification UNC 0724 (Urgent) Amendment to Ratchet charges during COVID-19 period

1. **Consultation close out date:** 27th April 2020
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:** Gazprom Energy
5th Floor
8 First Street
Manchester
M15 4RP
4. **Representative:** Steve Mulinganie
Regulation Manager
stevemulinganie@gazprom-mt.com
0799 097 2568 / 0751 799 8178
5. **Date of Representation:** 26th April 2020
6. **Do you support or oppose Implementation:**
We **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We agree with the proposers view that sites that are exceed anticipated gas use by increase production to combat the COVID-19 pandemic should not be penalised via the ratchet regime for doing so.
8. **Are there any new or additional Issues for the Modification Report:**
No
9. **Self-Governance Statement Do you agree with the status?**
NA

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We **agree** with the proposer that this modification is positive in respect of Relevant Objective **(a)**

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We **have not** identified any significant costs associated with this modification

12. Implementation:

What lead times would you wish to see prior to this modification being implemented, and why?

Owing to the need to provide certainty to customers they will not face excessive charges for increasing production, this change needs to be implemented as soon as possible

13. Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We have **no** comments on the Legal Text provided.

14. Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.

This modification, whilst reducing cost from ratchets for those customers, does not eliminate them. We suggest that the Class 2 provisions are extended to qualifying Class 1 sites for ratchet charge calculations. However this does not negate our support for the modification.