

Representation

Draft Modification Report

0382 - Reducing the capacity element of LDZ system charges for SSPs

Consultation close out date: 12 September 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: Major Energy Users Council

Representative: Eddie Proffitt

Date of Representation: 19 September 2011

Do you support or oppose implementation?

Not in Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

The Major Energy Users Council are opposed to the implementation of UNC mod 0392.

We believe that the balance between capacity and commodity has been developed over many years using evidence and logic. We would not support changes to the charging methodology to support a suppliers pricing methodology. If a supplier wishes to match his revenue and charges it should be his pricing methodology that should be changed to introduce a fixed element to match the capacity charge.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

0382

Representation

19 September 2011

Version 1

Page 1 of 2

© 2011 all rights reserved

Implementation:

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

Legal Text:

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

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

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