

## Representation - Draft Modification Report 0571/0571A

### Application of Ratchet Charges to Class 1 Supply Points (and Class 2 with an AQ above 73,200kWhs)

Responses invited by: **5pm 24 January 2017**

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

<b>Representative:</b>	Terry Burke
<b>Organisation:</b>	Statoil UK Ltd
<b>Date of Representation:</b>	24/01/2017
<b>Support or oppose implementation?</b>	<b>0571</b> – Support <b>0571A</b> - Oppose
<b>Alternate preference:</b>	<i>If either 0571 or 0571A were to be implemented, which would be your preference?</i> <b>0571</b>
<b>Relevant Objectives:</b>	a) Positive d) Positive f) Positive

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

Statoil supports 0571 as we feel that there are a number of small premises that have AQs above 73,200 but are still subject to the impact of the cold weather on their usage. It would not be advantageous to put them in a situation where they could ratchet, thus forcing shippers to choose Class 3 or 4 and defeating the objective of Nexus to have better control/visibility of the volumes across the industry.

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

As both mods have a material impact on customers we agree they should not be self-governance.

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

n/a

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

n/a

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

Yes

**Modification Panel Members have requested that the following question is addressed:**

**Q: Respondents are asked to provide views on who they believe should fund the central implementation costs.**

We believe Shippers should not have to cover the costs because the proposal overall seeks to improve the invoicing processes.

**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**

n/a