

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

Representative:	Andy Baugh
Organisation:	npower
Date of Representation:	23 rd January 2017
Support or oppose implementation?	0571 - Oppose 0571A - Support
Alternate preference:	<i>If either 0571 or 0571A were to be implemented, which would be your preference?</i> 0571A
Relevant Objectives:	a) Positive d) Positive f) Positive

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

Npower supports 0571A.

Ratchet charges have been in place for many years helping ensure security of supply. We see removing ratchet charges totally from Product Class 2 would place unnecessary risk to the industry as it would contain many DM sites. However, we also feel ratchet charges should not be applied to domestic customers, therefore, 0571A satisfies both of these concerns.

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

We agree these mods should not be classed as self-governance as they do have a material impact on customers.

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 do not feel Shippers should cover the costs as the mod applies to efficient management of the network.

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