Representation

Draft Modification Report

Modification Report UNC 0687
Creation of new charge to recover Last Resort Supply Payments

1. **Consultation close out date:**   6ᵗʰ September 2019

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

5. **Date of Representation:**   6ᵗʰ September 2019

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:**
   With the increased use of the SoLR process the lack of an explicit provision to recover costs from the relevant market means that domestic costs are being assigned to the non-domestic sector and vice versa. This modification addresses that miss allocation and more accurately targets costs.

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) & (c)**

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?

We would like to see the proposal implemented as soon as possible to avoid any future miss allocation of costs

13. Legal Text:
Are you satisfied that the legal text will deliver the intent of the modification?

We have **not reviewed** 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.

No