

Representation - Draft Modification Report UNC 0687

Creation of new charge to recover Last Resort Supply Payments

Responses invited by: 5pm on 06 September 2019

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	6 th September 2019
Support or oppose implementation?	Support
Relevant Objective:	a) Positive c) Positive

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

WWU supports this modification as it more accurately apportions cost from Supplier of Last Resort events to the appropriate customer groups. We agree that it furthers relevant objectives (a) and (c) and think that there is also an argument for furthering relevant objective (d) as it allocates costs more accurately and therefore would be expected to further competition between Shippers. Notwithstanding these comments, we think that as this affects DN charges the modification should have been considered against the charging objectives.

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

This should be implemented as soon as possible to allow DNs time to accommodate its provisions in their charges for 2020/21.

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

The implementation costs are unclear at present as this is currently being debated under the DSC change process (XRN 4992).

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

We note NGN's comments in their representation and have nothing to add to those comments

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