

Representation - Draft Modification Report UNC 0696V

Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs

Responses invited by: **5pm on 15 May 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	14/05/2020
Support or oppose implementation?	Support
Relevant Objective:	c) Positive f) Positive

The consultation is aimed at establishing if the content/effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0696 will be carried forward should parties not wish to change their original representation.

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

E.ON supports this modification as we believe the NExA capacity agreement should be seen as the primary value and should not contradict, exceed nor predate the value and effective from date of the NExA.

We would be in favour of the retroactive element of this modification as it would deliver the principles which we support prior to the implementation date. We believe it does meet Ofgem's test for retrospection and feel the consumer does have right for updates back to the cut-off point of 01/09/2018.

Finally, we are satisfied with the proposed solution with regards to ratchets and that the PMSOQ will not exceed the value of the NExA in the event of a daily capacity breach.

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

Aligned with the CDSP delivery date with no less than 6 months' notice for implementation.

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

Minimal system impacts may be required to retrospectively correct any incorrect capacity values and manual reviews, we do not believe this is however a project level deliverable

but there will be system enhancements which is why we also support 6 month's implementation to give time to design, build and test these changes.

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

No 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 Comments.

Please provide below any additional analysis or information to support your representation

No Comments.