

## Representation - Draft Modification Report UNC 0730

### COVID-19 Capacity Retention Process

**Responses invited by: 5pm on 05 November 2020**

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

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

<b>Representative:</b>	Claire Roberts
<b>Organisation:</b>	ScottishPower
<b>Date of Representation:</b>	5 <sup>th</sup> November 2020
<b>Support or oppose implementation?</b>	Qualified Support
<b>Relevant Objective:</b>	a) Positive d) Positive
<b>Charging Relevant Objective:</b>	c) Positive

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

ScottishPower's position is "qualified support" to the modification.

Many businesses have faced restrictions imposed by the UK Government by the means of Lockdown which has resulted in business working on reduced hours or ceasing trading which is out of their control. This will look to provide a short-term relief to those customers who be impacted by pandemic and have the Isolation flag set under UNC0723.

However, within the modification there is no set measure/obligations to ensure the capacity charge relief would be passed through to the end consumer or an end date to when the relief period would expire. There needs to be clear guidelines set for 1) how long this relief period will last and 2) ensure the relief is lifted as soon as the site is consuming gas again.

As the UK continues to have sanctions imposed by the UK Government by means of Lock Down restrictions, limited trading hours or having to close for periods of times. We anticipate the need for long term relief will be required as it is uncertain how long the pandemic will continue.

Are there any other long-term solutions that could be explored because of the ongoing impact and issues of the COVID 19 pandemic on the Gas Industry.

For example in Electricity there is a long-term vacant process is this something that could explored for Gas.

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

Implementation would be as soon as reasonably possible to allow for the benefits to reaped by Industry parties that have utilised the isolation flag.

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

No impacts or cost identified at present

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

No comment

**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.*

None

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

None