

Representation - Modification UNC 0797 (Urgent)

Last Resort Supply Payments Volumetric Charges

Responses invited by: **5pm on 04 January 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Mark Jones
Organisation:	SSE Energy Supply Limited
Date of Representation:	04 January 2022
Support or oppose implementation?	Support
Relevant Charging Methodology Objective:	a) Positive c) Positive

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

We support UNC 0797 (Urgent) as it will provide consistency to the gas and electricity markets regarding the correct allocation of SoLR costs to the sector from which they originate. The current situation creates an inequitable cross-subsidy between the non-domestic and domestic sectors within the gas market.

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

We would like to see the modification implemented as soon as possible.

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

No significant costs have been identified by us if this modification is implemented.

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

Yes.

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

UNC 0797 (Urgent) is a very similar modification to UNC 0687V, and whilst we support both modifications, we prefer UNC 0797 (Urgent) as it allocates non-domestic SoLR costs to the non-domestic sector in a more equitable manner. However, our preference is very dependent on it being able to be implemented in a similar timeframe as that planned for UNC 0687V, in order that it can be implemented for all upcoming SoLR levy costs, including those to be recovered under the faster SoLR levy process.