

Representation - Draft Modification Report 0563S

Moving the NTS Optional Commodity Charge Formula into the UNC

Responses invited by: **15 January 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Julie Cox
Organisation:	Energy UK
Date of Representation:	13 January 2016
Support or oppose implementation?	Support
Relevant Objective:	b) Positive e) Positive

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

Energy UK considers that this modification will provide for more appropriate governance of the Optional Commodity Charge (OCC) formula and parameters than is currently the case, where National Grid can unilaterally progress such changes.

If this modification is implemented the OCC does not become fixed rather any changes will be subject to robust UNC governance and oversight by Ofgem consistent with other charges. In addition, parties other than National Grid could propose changes again consistent with other charges and principles of open governance.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

Energy UK agrees with the self-governance statement

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

As soon as possible after the Panel decision

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

None

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

N/A