

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:	Marshall Hall
Organisation:	Oil & Gas UK
Date of Representation:	15 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)

In moving the NTS Optional Commodity Charge (OCC) into the UNC, Mod 563S would subject any change to the formula used to calculate the OCC to proper industry scrutiny and consultation. In doing so, it would bring the OCC within proper governance procedures which are lacking in current arrangements.

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

The self-governance designation of the Mod seems to be entirely appropriate since, in itself, it does not have a significant impact on gas consumers.

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

The Mod should be implemented as soon as the timetable allows.

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

Since the Mod simply brings the formula within the UNC, the Mod does not itself have any impact or associated costs.

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

Not applicable