

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:	Mary Teuton
Organisation:	VPI Immingham
Date of Representation:	22 nd December 2015
Support or oppose implementation?	Support
Relevant Objective:	b) Positive e) Positive

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

We support this proposal as, under the current arrangements, there is a lack of governance and due process compared to other elements of the UNC, which places unnecessary risk on those parties who choose the Optional Commodity Charge.

With the charge making up a large part of users' cost base, it is appropriate that any change is subject to wider consultation with industry and subsequent approval by the Authority. It is not appropriate for National Grid to have complete autonomy to make changes as it sees fit. In addition, this will align with other good practice around the UNC.

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

Yes, we believe that this modification is appropriate for self-governance as the change itself has no material impact on consumers, shippers or competition.

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

We believe that this change should be made at the earliest practical opportunity.

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

We do not envisage any impacts or costs on our organisation.

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

Yes, we are satisfied that the legal text delivers the intent.

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.*

We are not aware of any errors or omissions.

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

We have no further analysis to provide.