

Representation - Draft Modification Report 0587

Seasonal Energy Balancing Credit Cover

Responses invited by: **5pm on 06 October 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Joshua Phelps
Organisation:	The Renewable Energy Company (Ecotricity)
Date of Representation:	06/10/2016
Support or oppose implementation?	Support * <i>delete as appropriate</i>
Relevant Objective:	d) Positive * <i>delete as appropriate</i>

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

We support the implementation of this proposal. The reason for our support is that we believe that the current principle of maintaining winter cover during the summer period is an excessive expectation.

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

We agree that this should not be subject to self-governance.

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

We believe a months' notice would be a sufficient lead time for successful implementation.

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

We would be impacted in the sense that we would be required to complete the current task twice, but this cost should be outweighed by the cash flow benefit.

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

We are satisfied that the legal text will deliver the intent of the Solution.

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 believe there are no errors or omissions in this Modification Report.

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

Given that the summer period cover will be lower, we would need service level agreements on the time we shall be refunded the winter cover at the beginning of the summer season.