

Joint Office
enquiries@gasgovernance.co.uk

27 April 2020

Dear Sir or Madam,

Re: 0724U Amendment to Ratchet charges during COVID-19 period

Thank you for the opportunity to provide representation on the above noted Urgent Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Urgent Modification Proposal.

Reason for support/opposition:

Please summarise (in one paragraph) the key reason(s)

We support this proposal as the temporary reduction of ratchet charges, for sites which have increased their usage above the agreed booked capacity to support local and national needs during the COVID-19 response effort, should enable parties to continue providing aid. The additional ability to return to their pre-COVID level of SOQ, even if outside of the SOQ reduction period, ensures that any longer term impacts caused by the ratchet are also negated. This should redress some of the economic impacts that the COVID-19 situation is having across the wider energy industry, thus furthering Relevant Objective a) *efficient and economic operation of the pipe-line system*.

Implementation:

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

This proposal could be implemented as soon as Ofgem approval is received.

Impacts and Costs:

What analysis, development and ongoing costs would you face?

As income relating to charges as a result of Ratchets are resocialised, therefore there is no identified impact to NGN as a result of this proposal.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the Solution?

We believe the legal text provided should deliver the Solution set out in the modification.

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.

None identified.

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

Smell gas?

Call the National Gas Emergency
Service on 0800 111 999



1100 Century Way
Thorpe Park Business Park
Colton, Leeds LS15 8TU



0113 397 5300



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the network**

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager (Industry Codes)
Mobile: 07580 215 743

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