

## Representation - Draft Modification Report UNC 0619 0619A 0619B Application of proportionate ratchet charges to daily read sites

Responses invited by: **5pm on 01 March 2018**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Shane Preston
<b>Organisation:</b>	Scottish Power
<b>Date of Representation:</b>	1st March 2018
<b>Support or oppose implementation?</b>	0619 - Oppose 0619A - Oppose 0619B - Qualified Support
<b>Alternate preference:</b>	<i>If either 0619 or 0619A or 0619B were to be implemented, which would be your preference?</i> 0619B
<b>Relevant Objective:</b>	a) <b>0619A</b> Negative b) <b>0619A</b> Negative c) <b>0619A</b> Negative d) <b>0619 0619B</b> Positive

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

We have qualified support for 619B as it provides a good balance between incentive and sanction. We believe that this would not limit parties electing to become daily read sites while ensuring the network is protected without penalising end consumers.

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

Given that the modifications have a material impact they should be directed to the authority for a decision.

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

No comments

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

No comments

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

Yes

**Modification Panel Members have requested that the following questions are addressed:** *Remove Section if no questions*

*Q1: Please provide clear views and supporting evidence on the self-governance status of this modification focusing, in particular, on whether this proposal is likely to have a material impact upon competition in the shipping, transportation or supply of gas.*

No comments

*Q2: Respondents to provide a view as to whether or not this modification should be [re]designated as self-governance.*

No. These modifications should not be designated as self-governance.

*Q3: Please provide your views on the self-governance status.*

See above

**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