

**Joint Office**

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

8<sup>th</sup> January 2024

Dear Sir or Madam,

**Re: 0865 - Permitting DNOs to charge Shippers negative Supplier of Last Resort (SoLR) unit rates**

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

**NGN supports this Modification Proposal.**

**Reason for support/opposition:**

Ofgem published their minded to position in relation to the Last Resort Supplier Payment (LRSP) claims, which included net negative figures. The UNC wording was originally written on the basis that these would only be positive. Since the raising of this modification the final position as been published confirming that these claims will all be net positive, however it seems prudent to facilitate the change to UNC to ensure this is future proofed. This would therefore be positive for Relevant Objective c) Efficient discharge of the licensee's obligations as it permits DNOs to process claims from Suppliers in accordance with Standard Special Condition A48.

**Implementation:**

We agree that this modification should be self-governance and that implementation should as soon as practicable.

**Impacts and Costs:**

None identified.

**Legal Text:**

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

**Are there any errors or omissions in this Modification Report that you think should be taken into account?**

None identified.

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

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)  
Markets Regulation Manager  
Mobile: 07580 215743

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