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

Representative:	Chris Emery
Organisation:	Kronospan Limited
Date of Representation:	22/02/2018
Support or oppose implementation?	0619 – Support 0619A – Oppose 0619B - Qualified Support
Alternate preference:	*If either 0619 or 0619A or 0619B were to be implemented, which would be your preference?* 0619
Relevant Objective:	**a) 0619A** Positive **b) 0619A** Negative **c) 619B** Positive

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

I am representing a large industrial gas user:

0619 – Support: Current “Ratchet” charge would be removed and significantly lesser of a penalty, which is currently double the daily charge.

0619A – Oppose: This proposal does not change the current Penal Regime for any Customers using above 2,500 Therms. So this proposal only proposes to exempt the smallest (domestic sized) Customer from Ratchet Charges

0619B – Qualified Support: This proposal is ultimately less penal than the current charge however I favour modification 0619 which has no penal element

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

Not Applicable

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

As soon as reasonably practicable

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

Not Applicable

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

We have not reviewed the legal text

Modification Panel Members have requested that the following questions are addressed:

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 comment

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

No Comment

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

No comment

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 comment

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

No comment