

## Representation - Draft Modification Report

UNC 0636 0636A 0636B 0636C 0636D

### Updating the parameters for the NTS Optional Commodity Charge

Responses invited by: **5pm on 14 June 2018**

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

<b>Representative:</b>	Kamla Rhodes
<b>Organisation:</b>	ConocoPhillips (UK) Ltd
<b>Date of Representation:</b>	14 June 2018
<b>Support or oppose implementation?</b>	0636 - Oppose 0636A - Oppose 0636B - Oppose 0636C - Oppose 0636D - Oppose
<b>Expression of preference:</b>	<i>If either 0636, 0636A, 0636B, 0636C or 0636D were to be implemented, which would be your preference?</i>  N/A
<b>Relevant Objectives:</b>	0636: <b>g)</b> Negative  0636A: <b>g)</b> Negative  0636B: <b>g)</b> Negative  0636C: <b>g)</b> Negative  0636D: <b>G</b> Negative

**Relevant Charging Methodology Objectives:**

0636:  
a) Negative  
b) Negative  
c) Negative  
e) Negative

0636A:  
a) Negative  
b) Negative  
c) Negative  
e) Negative

0636B:  
a) Negative  
b) Negative  
c) Negative  
e) Negative

0636C:  
a) Negative  
b) Negative  
c) Negative  
e) Negative

0636D:  
a) Negative  
b) Negative  
c) Negative  
e) Negative

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

ConocoPhillips (UK) Ltd do not believe that the implementation of any of these proposals will enhance the current framework and are more likely to cause instability and disruption in the market.

The timing and timeframe of this mod that is closely followed by 0621 (transitional reform proposal) and 0653 (an enduring solution from 2019) are creating a lot of unnecessary uncertainty and does not enable a comprehensive understanding of the relevant charges when negotiating contracts.

We feel that the proposals are being rushed through without due consideration as to what the impact will be and that the Optional Commodity Charge cannot be looked at in isolation from the whole charging regime.

**Implementation:** *What lead-time do you wish to see prior to implementation and why? Please specify which Modification any issues relate to.*

ConocoPhillips (UK) Ltd does not support the implementation of any of these proposals.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face? Please specify which Modification any issues relate to.*

No comment

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution? Please specify which Modification any issues relate to.*

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 Impact Assessment has been provided.

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