

Representation - Modification UNC 0788 (Urgent)

Minimising the market impacts of 'Supplier Undertaking' operation

Responses invited by: **5:15pm on 20 October 2021**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Tim Davis
Organisation:	Barrow Shipping
Date of Representation:	20 October 2021
Support or oppose implementation?	Support
Relevant Objective:	Supports effective competition
Relevant Charging Methodology Objective:	Not Applicable

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

In the event of User failure, viable Suppliers may have, or be able to make, arrangements to source gas but not be able to credit this against their customers and so face significant cashout charges. Steps that avoid this are welcome.

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

Immediate

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

None

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

We welcome the legal text that encompasses a wide range of circumstances.

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

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

1. Ideally this modification proposal would have been subject to scrutiny and development to ensure all understood the scenarios envisaged by the legal text and, for example, provided a clear understanding of how any discretion offered to National Grid NTS would be exercised. However, time is of the essence and we would welcome assurance that, when evidence is presented to National Grid NTS as envisaged in 10.1.1 (d), the requirement to ensure this is “satisfactory to National Grid NTS” will be discharged swiftly by National Grid NTS, and that the presumption is that evidence will be accepted.