

## Representation - Modification UNC 0797 (Urgent) Last Resort Supply Payments Volumetric Charges

**Responses invited by: 5pm on 04 January 2022**

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

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

<b>Representative:</b>	Dion Tickner
<b>Organisation:</b>	Octopus Energy
<b>Date of Representation:</b>	January 4th
<b>Support or oppose implementation?</b>	Oppose
<b>Relevant Charging Methodology Objective:</b>	a) None c) None

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

Whilst we are supportive of the intention to provide transparency and fairness to the process for recovering Last Resort Supply Payments we are concerned that the pace of this code modification does not allow time for unintended consequences of a volumetric methodology to be fully debated and understood. We are not opposed to the concept of debating this modification however the speed at which this modification has had to be considered has led us to oppose it.

This modification was raised by a non-domestic supplier and as such it cannot be presumed that this modification would consider the impacts of a volumetric methodology on the domestic market, however it appears to be raised in relation to both the non-domestic and domestic market. It is therefore possible that there could be unintended consequences that are at risk of being missed due to the urgency of this modification.

In concept this modification will protect those who use less gas which seemingly makes the LRSP process more fair. However, suppliers have not had enough time to fully understand how this code mod works in conjunction with existing codes as well as code modifications live or in the pipeline and other mechanisms in the domestic market (such as the Price Cap).

Of greatest concern, multiple urgent code mods the industry creates a hasty solution that, although may be well intentioned, unfairly impacts consumers.

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

n/a

**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?*

n/a

**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.*

n/a

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

n/a