

## 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>	Laura Holt
<b>Organisation:</b>	R & L Holt Ltd & Springhill Nurseries Ltd
<b>Date of Representation:</b>	4 <sup>th</sup> Jan 2022
<b>Support or oppose implementation?</b>	Oppose
<b>Relevant Charging Methodology Objective:</b>	a) Negative * <i>delete as appropriate</i> c) Negative * <i>delete as appropriate</i>

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

This change applies the burden of smaller gas suppliers' failure on the larger gas consumer. This is an unreasonable change as these smaller suppliers operate in the smaller supply market and therefore the costs of their failure should be borne by the small consumer – for which market these suppliers intend.

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

None

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

Significant impact in gas costs, which are already at an all time high that threatens our ongoing viability as a business. Gas costs have gone from 12.3% of our cost base to 49.42% of our cost base in the last five months comparing this year with the same period last year already just for R & L Holt Ltd.

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

no

**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**

We are struggling to pay gas costs currently as our sales to supermarkets do not reflect the true price increases of gas we are incurring in the past six months. Added to that the deadlines imposed by Ofgem to consider these amendments coincide with the Christmas and New Year holidays and that has made it difficult for all industrial/commercial consumers to respond or even know about them. Hence I suspect the response rate is lower than expected at a non holiday time of year.