

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

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

To: enquiries@gasgovernance.co.uk

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

Representative:	Francesca Bille
Organisation:	Springhill Farms (Pershore) Ltd
Date of Representation:	4 th January 2022
Support or oppose implementation?	Oppose
Relevant Charging Methodology Objective:	a) Negative c) Negative

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

I oppose the implementation as I believe the proposed change is an unreasonable burden for greater gas consumers, compared to smaller. It is partial that the suppliers who have not created this problem, face the burden of covering it up for those who have failed to participate in the market.

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?*

Gas prices and costs are currently at an unprecedented, historic level and my business faces difficult conversations regarding our future. Our energy costs have risen from a base level of 15% to currently 50% from the last two quarters of 2021, compared to the same time frame, pre-pandemic.

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

As a business that grows tomatoes in industrial sized glasshouses with advanced lighting and heating technologies, the increase in energy prices in recent months has hit us hard. We have had to make tough decisions which have determined the growth of our crop and ergo, our sales to retailers will decrease compared to the last FY.

Furthermore, the deadline for this consultation response being on January 4th, the first, real working day of the new calendar year, is a poor choice from Ofgem, and such I would not be surprised if the consultation response is considerably lower than what it would be if it was carried out in summer, our peak season, for example.