

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:	Louise Hellyer
Organisation:	TotalEnergies Gas & Power
Date of Representation:	4 Jan 2022
Support or oppose implementation?	Support
Relevant Charging Methodology Objective:	a) Positive c) Positive

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

TotalEnergies Gas and Power are in support of modifications which are delivering the objective of the letter issued by Ofgem to target cost recovery of SoLR claims to the part of the market which generated the cost. Although a meter point charge may be closer aligned to Power models, we agree that a volumetric approach is also fair, possibly more so to low consuming domestic customers.

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

We would like to see this implemented as soon as possible to get reflected within the GDN's April 22 charging statements. This is to ensure that we do not see significant impacts to the non-domestic sector as outlined in Ofgem's recent communications in this area.

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

There would be minimal one-off costs for implementing this.

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

We have not reviewed the legal text.

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

No further comments.