

Representation

Draft Modification Report

0500 - EU Capacity Regulations - Capacity Allocation Mechanisms with Congestion Management Procedures

Consultation close out date: 19 December 2014

Respond to: enquiries@gasgovernance.co.uk

Organisation: RWE Supply & Trading GmbH

Representative: Charles Ruffell

Date of Representation: 19 December 2014

Do you support or oppose implementation?

Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

Implementation of this modification will introduce changes to the UNC rules for access to and management of NTS Entry Capacity and NTS Exit (Flat) Capacity at Interconnection Points. These changes are required to ensure compliance with EU rules as set out in the Capacity Allocation Mechanisms (CAM)) network code, together with arrangements set out in Congestion Management Procedures (CMP).

Are there any new or additional issues that you believe should be recorded in the Modification Report?

None.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that implementation will further relevant objective g); and would better facilitate relevant charging objective e).

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

Unclear at this stage but not expected to be high.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

Implementation needs to be consistent with the CAM implementation date of 1st November, 2015. Certainty over implementation will also help NGGT plan its proposed industry awareness and training days.

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Version 1.0

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Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

No.