

Representation - Draft Modification Report UNC 0759S

Enhancements to NTS Within-Day Firm Entry and Exit Capacity Allocations

Responses invited by: **5pm on 11 June 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Lauren Jauss
Organisation:	RWE Supply & Trading GmbH
Date of Representation:	11 June 2021
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive

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

Later Exit Capacity Auctions within day will give gas fired electricity generators, such as ourselves, more opportunity to book capacity which better reflects actual usage during the overnight period, including when called upon to run at short notice to help balance the electricity system. Gas fired generators' cost of overruns and/or unused capacity should therefore reduce, enabling them to make more competitively priced bids in the electricity market. This would in turn reduce electricity wholesale prices which would be expected to be passed through to consumers.

Self-Governance Statement: Please provide your views on the self-governance statement.

We agree that the proposal meets the self-governance criteria and should be subject to self-governance.

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

We believe the cost/benefit of this modification will be very positive and we support implementation with a minimum lead time.

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

We would not face any analysis, development or ongoing costs.

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

We agree that the legal text will deliver the intent of the solution.

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.*

We are not aware of any errors or omissions in this Modification Report that should be taken into account.

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

We do not have any further comments.