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November 9, 2007

Re: Proposed UNC Modification 0181: Scheduling Charges calculation for Gas Flow Days 22,23,24,25 & 26 October 2007

Dear Julian,

RWE Npower offers qualified support for the proposed UNC Modification. The background behind the raising of this Modification is the fact that User access to Gemini was revoked for five days owing to technical issues. While this access was revoked nominations were sent to National Grid manually, and so Users were unable to provide accurate nomination information as efficiently as they otherwise might have done, and as such errors are likely to have arisen.

We agree that it is inherently unfair to levy Scheduling Charges against Users on what may be inaccurate data when they were prevented from efficiently notifying National Grid of their nominations through no fault of their own.

However, we believe that the principle proposed in the Modification of using an average historical value to take the place of the normal nomination derived Scheduling Charges for the affected days is flawed as it is simply replacing one erroneous figure with another. We feel that it would have been more appropriate for the Scheduling Charges for the affected days to be zero rated. However as this is not what has been proposed we believe that implementation of the Modification in its current form is preferable to levying Scheduling Charges on the basis of potentially flawed nomination data.

If it is possible to raise an Urgent Modification to disapply Scheduling Charges over the affected days prior to raising the October Balancing invoice we would support this. However, if not we offer our qualified support for this Modification provided that this does not set a precedent for how such an issue may be treated in future should similar problems arise.

If you wish to discuss any points raised in this response further, please do not hesitate to contact me.

Regards,

Chris Hill

Gas Codes Analyst

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