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Re: Proposed UNC Modification 0242: "Changes to the window for the Submission of Valid Meter Readings"

Dear Bob,

On behalf of RWE npower, I would like to thank you for the opportunity to respond to the above titled UNC Mod Proposal.

RWE npower supports the implementation of Mod 242. We believe that by extending the window for submission of valid meter readings from the current 15 business days to 25 business days should help to facilitate a more accurate allocation of energy and transportation charges between relevant Users. It should also provide timely re-allocation of energy and transportation charges through the RbD process.

By extending the window for Meter Readings submission, it is very likely that the industry could see a significant decrease in the number of potential Must Reads generated by xoserve. Given that the extra days will allow for extra time for validation of reads by shippers, it should be expected that this could prompt acceptance of more reads by the Transporters that would otherwise be rejected for failing the submission deadline.

We also believe that the implementation of Mod 242 should increase the proportion of reads accepted by xoserve. This however, could lead to xoserve holding more accurate AQ data, which in turn should reduce the volume of sites with inaccurate AQ values that Shippers will need to challenge during AQ Review. This can only be beneficial to the system as a whole as well as ensuring that Shippers costs are more accurately attributed.

Should you wish to discuss any of the above please do not hesitate to contact me.

Regards,

Sham Afonja
Gas Codes & Agreements Analyst

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