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Modification Proposal 0287: Change System Capacity Transfers Notification Time Limit from 04:00 hours to 03:00 hours

Dear John

We welcome the opportunity to comment on this modification proposal. This response is provided on behalf of RWE npower and RWE Supply and Trading GmbH.

We do not support implementation of this modification proposal. It is not clear to us that National Grid actually requires the full 60 minute window to either reject or accept a proposed capacity transfer. Furthermore, National Grid has not suggested that the current 04.00 time limit has caused it operational problems in the past, so there seems no strong argument to change now. Our view is that Users should have the maximum time to respond to events and manage their capacity position and reducing the time window for this is not beneficial to the market.

It is hard to see this proposal as anything but a reduction in the service provided by xoserve to Shippers and only of operational benefit to National Grid. We therefore strongly disagree that Shippers should fund any costs under the User Pays arrangements.

We hope these views are helpful and would be happy to discuss matters further.

Yours sincerely

By Email So Unsigned

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