



Mr. Tim Davis
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October 11, 2010

Re: No 0318/0318A - The approach to be taken when raising alternative Modification Proposals

Dear Tim,

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 support the implementation of Mod 0318. We believe that 0318 facilitates the discharge of the Licensee's obligations as defined under Standard Special Condition A11.1(c).

The addition of the ability of the panel to refuse to award additional time to develop alternative modifications if they believe that the modification could reasonably have been raised earlier in the process under 0318A seems a reasonable measure to put in place in order to prevent abuse of the process, but the use of the Panel's discretion without any additional guidelines or draft text means that our view is that it does not provide sufficient transparency to allow certainty in the process.

It is also not clear what rights the proposer of the alternative would have with regard to appealing the Panel's decision to refuse additional time to develop the alternative modification.

This is not to say that we do not support the principles introduced by 0318A but would need to see more work done in the areas highlighted above before deciding to lend our support for the modification.

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

Regards,

Robin Healey

RWE npower

[RWE npower](#)

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October 7, 2010

Re: No 0319 Code Governance Review: Role of Code Administrators and Code Administration Code of Practice

Dear Tim,

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 support the implementation of Mod 0319. We believe that 0319 facilitates the discharge of the Licensee's obligations as defined under Standard Special Condition A11.1(c). The development of a Code Administrator Code of Practice (CoP) brings each of the Codes into alignment in this respect and furthermore aligns many aspects of the Codes modification process.

Whilst we agree with the rationale that the proposed change will reduce complexity and fragmentation in the UNC, it is questionable as to whether this will have a significant impact in terms of promoting competition by removing some of the barriers that this complexity introduces.

We are satisfied that the draft legal text accurately reflects the intentions of the proposed modification and have no amendments to add.

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

Regards,

Robin Healey

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October 7, 2010

Re: No 0320 Code Governance Review: Appointment and Voting Rights for a Consumer Representative and Independent Panel Chair

Dear Tim,

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 support the implementation of Mod 0320. We believe that 0320 facilitates the discharge of the Licensee's obligations as defined under Standard Special Condition A11.1(c).

However, we do not agree that one of the consumer representatives should be appointed by the Authority – each of the representatives should be selected using a transparent process which ensures that the representative is independent and acting on behalf of the consumers which they represent.

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

Regards,

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October 7, 2010

Re: No 0321 Approach to environmental assessments within the UNC

Dear Tim,

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 support the implementation of Mod 0321. We believe that 0321 facilitates the discharge of the Licensee's obligations as defined under Standard Special Condition A11.1(c).

However, we are unconvinced that there are any benefits against Standard Special Condition 11.1(f) since this modification is actually introducing an additional process to be completed as part of the modification procedure. This does not effect our support for the modification since we agree with the principles that the modification is intended to introduce but we cannot support the view that the modification increases efficiency when compared to the current arrangements.

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

Regards,

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October 11, 2010

Re: No 0322 - Code Governance Review: Inclusion of the Gas Transmission Transportation Charging Methodology and Gas Transmission Connection Charging Methodology within the UNC

Dear Tim,

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 support the implementation of Mod 0322. We believe that 0322 facilitates the discharge of the Licensee's obligations as defined under Standard Special Condition A11.1(c).

Whilst we agree with the rationale that the proposed change will improve transparency and accessibility of the governance process, it is questionable as to whether this will have a significant impact in terms of promoting competition by removing some of the barriers that the existing arrangements introduce.

We are satisfied that the draft text and associated Annexes accurately reflect the intentions of the proposed modification and have no amendments to add.

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

Regards,

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October 7, 2010

Re: No 0323 Self Governance

Dear Tim,

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 support the implementation of Mod 0323. We believe that 0323 facilitates the discharge of the Licensee's obligations as defined under Standard Special Condition A11.1(c).

We are satisfied that the draft legal text accurately reflects the intentions of the proposed modification and have no amendments to add.

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

Regards,

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October 11, 2010

Re: No 0325 - DN Transportation Charging Methodology and Change Governance

Dear Tim,

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 support the implementation of Mod 0325. We believe that 0325 facilitates the discharge of the Licensee's obligations as defined under Standard Special Condition A11.1(c).

Whilst we agree with the rationale that the proposed change will improve transparency and accessibility of the governance process, it is questionable as to whether this will have a significant impact in terms of promoting competition by removing some of the barriers that the existing arrangements introduce.

We are satisfied that the draft text accurately reflects the intentions of the proposed modification and have no amendments to add.

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

Regards,

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