

Representation

Draft Modification Report

0352 – The Introduction of an Interruptible Reverse Flow service at Moffat Interconnector

Consultation close out date: 12 August 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: RWE Npower plc / RWE Supply & Trading GmbH

Representative: Charles Ruffell

Date of Representation: 05 August 2011

Do you support or oppose implementation?

Support * *delete as appropriate*

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

The key reason for supporting the modification is that, by facilitating an Interruptible Reverse Flow Service at Moffat, it potentially enhances market liquidity and allows greater integration between the Irish and UK gas markets.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

None.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

We do not believe that this is a self-governance modification.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that implementing this service would further relevant objective:

b) Coordinated, efficient and economic operation of

(i) the combined pipe-line system, and/ or

(ii) the pipe-line system of one or more other relevant gas transporters.

And relevant objective:

d) Securing of effective competition:

(i) between relevant shippers;

(ii) between relevant suppliers; and/or

(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

None.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

Implementation of this modification is contingent upon the existing CSA being amended, which is subject to Irish governance processes. Implementation will therefore need to be as soon as possible following completion of the necessary amendments to the CSA.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

Nothing further.