

## Representation

### Draft Modification Report

#### 0362 - Use of 'notional Meter Readings' and 'Agreed Opening Meter Readings' for Individual CSEP Reconciliation

**Consultation close out date:** 19 May 2011

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** **RWE Npower**

**Representative:** Sham Afonja

**Date of Representation:** 18 May 2011

#### **Do you support or oppose implementation?**

Support

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

RWE Npower supports the implementation of Mod 0362. We believe that the implementation of this mod should help to reduce the misallocation of energy to RbD shippers, whilst also improving a level accuracy of CSEP charges allocated to relevant shippers.

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

No.

#### **Self Governance Statement:**

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

Yes.

#### **Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

Standard Special Condition A11.1 (d): securing of effective competition by reducing the misallocation of energy to RbD Shippers.

0362

Representation

18 May 2011

Version 1.0

Page 1 of 2

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**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?*

As a self-governance mod we expect implementation to follow this approach.

**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.*

It should be noted that some iGT generated estimates can be overstated and its use if 'unchallenged' by a Shipper could create an error in the CSEP reconciliation thereby inaccurately affecting the allocation of energy and subsequent calculated charges to Shippers.

In addition, the numbers of generated estimates by iGTs for LSPs are relatively low compared to the SSP sector, which in fact leaves the "Agreed Read" between the incoming and outgoing shippers to be utilised for this reconciliation. Therefore in order for this mod to achieve its relevant objectives, the iGTUNC mod equivalent must clarify the two definitions and also introduce this provision into the iGTUNC.