

## Representation

### Draft Modification Report

#### 0363 - Commercial Arrangements for NTS Commingling Facilities

**Consultation close out date:** 12 September 2011

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

**Organisation:** **RWE Npower plc / RWE Supply & Trading GmbH**

**Representative:** Charles Ruffell

**Date of Representation:** 9 September 2011

#### Do you support or oppose implementation?

Qualified Support \* *delete as appropriate*

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

The proposed commercial arrangements, based upon an end-of-day netting off process, represent a pragmatic charging solution for what is currently a unique facility on the NTS. Our concern is whether the new classification of facility into the UNC, ('NTS Commingling Facility' (NTS CF)) would prevent other types of facility that exhibit similar properties to a NTS CF from availing of the arrangements and the extent to which this could be considered discriminatory. An overly restrictive definition means that where other projects request a connection arrangement of this kind, further code modification(s) may be necessary.

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

We believe that all relevant issues raised and discussed during the development process have been reflected in the Modification Report.

#### Relevant Objectives:

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

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We agree that introducing these commercial arrangements into UNC to facilitate the connection of this defined class of facility by implementing this proposal will have a marginally positive impact on Code Relevant Objectives:

c) Efficient discharge of the licensee's obligations;

and

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?*

We agree with the proposed implementation date set out in the Draft Modification Report.

**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.