

## Representation

### Draft Modification Report

#### 0374 - Interruptible to Firm – Supply Point Transition

**Consultation close out date:** 12 August 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** npower ltd  
**Representative:** Jonathan Wisdom  
**Date of Representation:** 12<sup>th</sup> August 2011

#### Do you support or oppose implementation?

Support

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

npower believe that allowing a soft landing for consumers on Interruptible reform is a necessary element of interruptible reform. Consumers and Shippers are working extremely hard to ensure that the correct capacity values for sites are confirmed from the 1<sup>st</sup> October, however, it should be recognised that any change to the market arrangements should not inflict a poor result on the consumer. We agree with the Proposer that this UNC modification achieves that aim and allows consumers time to adapt to the new market arrangements.

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

None identified

#### Relevant Objectives:

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

We agree with the proposer that relevant objective (c) is fulfilled by this modification. However, we also believe that relevant objective (b) is fulfilled as this proposal will encourage consumers to state their true belief of their capacity without inflating this to avoid possible ratchet charges. This will assist the economic operation of the pipeline and feed into the stated desire of some of the GT's to have more accurate SOQ/SHQ data through Modification 0329 and modification 0390.

0374

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12 August 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?*

**Implementation:**

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

Prior to 1<sup>st</sup> October 2011 so Shippers and consumers have sight of the risk they are liable for.

**Legal Text:**

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

We are satisfied with the legal text.

**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.*

N/A