

## Representation

### Draft Modification Report

#### 0382 - Reducing the capacity element of LDZ system charges for SSPs

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

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

**Organisation:** **RWE npower**

**Representative:** Helen Inwood

**Date of Representation:** 09 September 2011

#### Do you support or oppose implementation?

Support *delete as appropriate*

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

npower support this modification since it aligns settlement costs with supplier billing. This addresses cash flow issues and removes potential barriers to entry for new suppliers.

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

No

#### Relevant Objectives:

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

This meets Objective ( c ) – facilitates effective competition

#### 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 would support the dates proposed in the consultation since this gives suppliers adequate notice of the changes.

0382

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**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.*

We believe 0382 is easier to administer than the other proposal being considered (0383) – where we have concerns that offering different payment terms for small suppliers can become difficult to track in the event of insolvency or takeovers by larger companies.