

## Representation

### Draft Modification Report

#### **0392: Proposal to amend Annex A of the CSEP NExA table, by replacing the current version of the AQ table**

**Consultation close out date:** 16 November 2011

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

**Organisation:** RWE Npower

**Representative:** Sham Afonja

**Date of Representation:** 15 November 2011

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

Support

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

Since the AQs in the CSEP NExA table have not been reviewed for a number of years they do not currently accurately reflect current average consumption levels. We believe that by amending the Annex A of the CSEP NExA with the revised version produced by the IGT030 Review Group it would ensure that the AQ values contained within the NExA Table remain fit for purpose. This equally represents a reasonable estimate of the expected gas offtake in accordance with house type and geographical location for domestic properties connected to an iGT Network.

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

None

### **Relevant Objectives:**

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

By amending the CSEP NExA and updating UNC TPD Section G, Annex G-3 with the AQ values proposed within Draft Modification Report 0392 we believe its implementation would better secure competition by limiting the instances of inequitable allocation of charges owing to the misallocation of energy volumes. The implementation of Modification 0392 can only be beneficial in that its introduction would ensure the AQ values that are related to CSEPs are more accurately recorded and as such domestic Transportation Charges for Shippers iGT portfolios are more appropriately apportioned and levied.

### **Impacts and Costs:**

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

There are no associated ongoing costs for RWE Npower should this Modification be implemented.

### **Implementation:**

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

We would like to see the new CSEP NExA table in place for 1st January 2012 in line with the scheduled IGT price change.

### **Legal Text:**

*Are you satisfied that no legal text is required to 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.*

As part of the discussion at the IGT030 workgroup, the group agreed that the revised table is more reflective of the current AQ consumption across the market. Therefore, the increased accuracy of AQ values as a result of bringing them up to date will most likely change the allocation of energy and transportation costs between shippers.