

Representation

Draft Modification Report

0403: EU Third Package: 21 day switching with flexible objection period

Consultation close out date: 02 March 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **RWEnpower**

Representative: Edward Hunter

Date of Representation: 28th Feb 2012

Do you support or oppose implementation?

Not in Support

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

RWEnpower considers this modification an overly complex solution to implement the EU 21 day switching directive and would incur considerable system development costs. Absorbing the reduction in the number of business days within the objection window creates a peak in workload and increases the risk of erroneous transfers.

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?

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Version 1.0

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This modification facilitates compliance with EU Regulation therefore fulfils Relevant Objective g) "compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators" is better facilitated by the Modification

Impacts and Costs:

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

This modification would require significant system development costs.

Implementation:

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

N/A

Legal Text:

Are you satisfied that the legal text and the proposed ACS (see www.gasgovernance.co.uk/proposedACS) 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.

No