

Representation

Draft Modification Report

0407: Standardisation of notice periods for offtake rate changes for all National Grid NTS Exit Users

Consultation close out date: 06 September 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: RWE Supply & Trading GmbH
Representative: Charles Ruffell
Date of Representation: 06 September 2013

Do you support or oppose implementation?

Comments

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

We agree that the proposed arrangements represent a pragmatic, economic and efficient solution to the issues raised in the Modification Proposal. Analysis has highlighted that investment-based solutions on either the NTS or GDNs would be uneconomic. Review of the performance against the 2 hour/5% rule has shown low levels of historic compliance with little adverse impact. We believe that it is appropriate to retain the 2 hour/5% rule so enforced when required at or near peak conditions. Publication of the proposed short-term flexibility warning will improve transparency about the system status for all Users.

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?

We believe that it would further Relevant Objective (c) Efficient discharge of the licensee's obligations.

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 implementation lead-times set out in the Draft Modification Report.

Legal Text:

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

Yes.

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Version 1.0

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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 further comments.