

## Representation

### Draft Modification Report

#### 0411S: Removal of the Obligation to Publish Firm Gas Monitor from the UNC

**Consultation close out date:** 01 June 2012

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

**Organisation:** RWE Npower plc / RWE Supply & Trading GmbH

**Representative:** Charles Ruffell

**Date of Representation:** 28 May 2012

#### Do you support or oppose implementation?

Support

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

The expectation is that the Firm Gas Monitor from winter 2012/13 will be set at greater than 100% of storage capacity. This is a consequence of changes to the designation of demand from interruptible to firm under modifications 0090 and 0195AV, rather than any change in supply or reduction in the level of security of supply. Therefore, retaining the obligation to publish the Firm Gas Monitor indicating an immediate and winter-long breach is no longer appropriate and may be misleading.

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

No.

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes.

#### Relevant Objectives:

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

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We agree implementation will have a positive impact on Code Relevant Objective(s):

f) Promotion of efficiency in the implementation and administration of the Code

by removing the obligation to release information that is no longer fit for purpose and is potentially misleading.

**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?*

There is no reason not to implement 16 days after the decision is made.

**Legal Text:**

*Are you satisfied that the legal text [and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://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.