

Representation

Draft Modification Report

0419: Redefining the capacity of the Specified Exit Point used in the calculation of the NTS Optional Commodity tariffs

Consultation close out date: 11 June 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: RWE Npower plc / RWE Supply & Trading GmbH

Representative: Charles Ruffell

Date of Representation: 11 June 2012

Do you support or oppose implementation?

Support

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

We endorse the rationale for the availability of the NTS Optional Commodity tariff and support the proposed changes as they will result in a workable charging methodology.

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

c) Efficient discharge of the licensee's obligations;

d) Securing of effective competition:

(i) between relevant shippers;

(ii) between relevant suppliers; and/or

(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers

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

The impacts are modestly positive against the Code Relevant Objectives for this specific modification proposal and derive mainly from implementing a workable charging methodology. The principal benefit is the continued availability of the Optional Commodity tariff.

Impacts and Costs:

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

No additional costs.

Implementation:

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

The new methodology should be available before 1st October 2012.

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.

No.