

Representation

Draft Modification Report

0449: Introduction of Interconnection Points and new processes and transparency requirements to facilitate compliance with the EU Congestion Management Procedures

Consultation close out date: 08 August 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: RWE Npower plc / RWE Supply & Trading GmbH

Representative: Charles Ruffell

Date of Representation: 08 August 2013

Do you support or oppose implementation?

Support

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

We believe that the introduction of Oversubscription and Buyback, Surrender processes and Transparency obligations are required to ensure compliance with the CMP from October 2013. The new processes necessary to facilitate implementation of this modification are largely based on the use of existing system functionality and as such represent a pragmatic solution.

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

We recognise that this is an interim solution and that a number of the processes and definitions, together with new processes will need to be reviewed as part of the CAM implementation.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

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

g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

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?

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We agree that it should be implemented earliest practical opportunity and preferably before 1st October 2013.

Legal Text:

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

Yes, although the definition of Interconnection Points, Transparency obligations, oversubscription and surrender processes will need to be reviewed as part of the CAM implementation process

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.