

Representation

Draft Modification Report

0471S - Amending the start time that a Day-ahead Market Offer can be accepted

Consultation close out date: 27 January 2014

Respond to: enquiries@gasgovernance.co.uk

Organisation: RWE Supply & Trading GmbH

Representative: Charles Ruffell

Date of Representation: 23 January 2014

Do you support or oppose implementation?

Support

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

Insert Text Here

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

None.

Self Governance Statement:

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

Yes, we agree with the Modification Panel's decision that this should be a self-governance modification.

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)

- 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.

The main benefit is as identified in the DMR is that being able to trade the OCM Daily Title product on the OCM market from 08:00 Day-ahead should increase liquidity and ensure that the gas demand for CCGTs can be efficiently traded at the same time as the Day-ahead power auctions.

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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 would like this to be implemented in line with the introduction of Day-ahead power auction in February 2014.

Legal Text:

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

Yes, we are satisfied that the legal text will deliver the intent of the modification.

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.

Nothing further.

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