

Secretary, Modification Panel
Joint Office of Gas Transporters

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Modification Proposal 0265: Creation of a NTS Entry Capacity Retention Charge within the Uniform Network Code

We welcome the opportunity to comment on this modification proposal. This response is provided on behalf of the RWE group of companies, including RWE npower and RWE Supply and Trading GmbH.

Modification proposal 0265 is an enabling modification that will define the NTS Entry Capacity Retention Charge as a Transportation Charge within the UNC and is therefore a key part of implementing the proposed entry capacity substitution arrangements. Within this limited context and should these arrangements be implemented, we would not object to its implementation. However, for the avoidance of doubt, we are not offering our support for the capacity substitution methodology based upon the "Retainer Approach".

We hope these views are helpful and would be happy to discuss matters further.

Yours sincerely

By Email So Unsigned

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