

Representation

Draft Modification Report

0326VV - Allocation of unidentified gas following the appointment of the Allocation of Unidentified Gas Expert (AUGE)

Consultation close out date: 06 January 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **RWEnpower**

Representative: Edward Hunter

Date of Representation: 05/01/2012

Do you support or oppose implementation?

Neutral

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

RWE npower is unconvinced that given the uncertainty this will cause for financial processes by giving the ability to open a previous gas year, whether the benefits case is clear. It does however acknowledge that wherever AUGE methodology is applied, historically or not, it is more accurate than previous cost allocation.

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?

RWEnpower agree that the accurate allocation of costs across the shipper community will better facilitate effective competition as per Relevant Objective (d.)

Impacts and Costs:

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

Potential financial analysis and rework costs. (Resource)

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Version 1.0

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Implementation:

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

None.

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