

Representation

Draft Modification Report

0458 – Seasonal LDZ System Capacity Rights.

Consultation close out date: 22 April 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: RWE npower
Representative: Edward Hunter
Date of Representation: 22 April 2014

Do you support or oppose implementation?

Support

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

RWEnpower agrees that this modification avoids unnecessary costs for the consumer from unnecessary reinforcement of network connections due to inherent seasonal differences in the way specific consumers may use gas.

Modification Panel Members have indicated that it would be particularly helpful if the following could be addressed in your response:

Q1 - Your view is sought on whether this modification furthers Relevant Objective (d) in addition to those stated (a, b and c):

This modification is purely about ensuring efficient use of existing networks where the consumer's demands may vary seasonally. We cannot see that it has any discernable impact on competition or therefore objective d.

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

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that the proposal has a positive effect in the respect of objectives a, b and c.

Impacts and Costs:

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

None

0458

Representation

20 March 2014

Version 1.0

Page 1 of 2

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Implementation:

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

Implementation is required to coincide with seasonal demand variances.

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