

## Representation - Draft Modification Report 0587

### Seasonal Energy Balancing Credit Cover

Responses invited by: **5pm on 06 October 2016**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Charles Ruffell
<b>Organisation:</b>	RWE Supply & Trading GmbH
<b>Date of Representation:</b>	4 <sup>th</sup> October 2016
<b>Support or oppose implementation?</b>	Comments
<b>Relevant Objective:</b>	d) None

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

The proposed change to the Energy Balancing Credit Rules could benefit those shippers with a marked seasonal load profile, although the analysis presented was equivocal. The adverse impact of the current levels of security on the market was not demonstrated and we are not convinced of the positive competition impact. We support this being an optional service, with User Pays charges applicable to those shippers that take up the option.

**Self-Governance Statement: Please provide your views on the self-governance statement.**

We agree that this should not be subject to self-governance arrangements.

**Implementation: What lead-time do you wish to see prior to implementation and why?**

If possible, implementation should allow the service to be available in summer 2017.

**Impacts and Costs: What analysis, development and ongoing costs would you face?**

None.

**Legal Text: Are you satisfied that the legal text will deliver the intent of the Solution?**

Yes.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

None identified.

**Please provide below any additional analysis or information to support your representation**

None.