

## Representation - Draft Modification Report 0591S

### DSR – Removal of 7 Day rolling profile functionality

Responses invited by: **5pm on 11 August 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>	5 <sup>th</sup> August, 2016
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective(s):</b>	c) Positive

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

We agree that these changes need to be made so that the UNC is consistent with the latest version of the Ofgem-approved DSR Methodology.

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

The modification should be subject to self-governance as it introduces consequential changes that arise following revision of the DSR methodology.

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

As soon as practicable under the self-governance framework to give the market certainty of the DSR arrangements ahead of 1<sup>st</sup> October.

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

None. We would note, however, that the removal of the 7 day rolling profile facility will significantly increase the frequency with which shippers will need to post DSR Offers and may have an adverse effect on the uptake of the product.

**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.*

No.

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

None.