

Representation

Draft Modification Report

0478 - Filling the gap for SOQ reductions below BSSOQ until Project Nexus

Consultation close out date: 21 March 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: RWE npower
Representative: Amie Charalambous
Date of Representation: 21 March 2014

Do you support or oppose implementation?

Support

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

We believe that this modification is a sensible approach and allows for flexibility for Daily Metered end consumers to be able to reduce their capacity reservation that is more reflective of their current capacity usage

We feel that the implementation of this modification is a positive step for end consumers. Should the end consumer have reduced consumption but could not reduce capacity below the BSSOQ, they would ultimately be penalised. We would consider this to be unfair and we would like to see a mechanism to be able to set it lower. This modification will act as an enduring solution for what previous modifications 275 and 405 previously achieved

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?

We believe that the implementation of this modification would will better facilitate the achievement of the Relevant Objectives a & c, as detailed in the modification proposal

Impacts and Costs:

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

The impacts for npower would be minimal

Implementation:

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Version 1.0

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

We would support the lead times recommended in the proposal.

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