

Julian Majdanski
UNC Modification Panel Secretary
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
Solihull
West Midlands
B91 3 QJ
29th December 2006

Your ref
Our ref
Name Simon Howe
Phone 01905 340720
E-Mail Simon.howe@npower.com

**Mod 0124,
Amendment to the window for acceptance of Meter Reads by the Transporter**

Dear Julian,

On behalf of RWE npower I would like to thank you for the opportunity to respond to this modification proposal. RWE npower supports the implementation of Mod 0124, "Amendment to the window for acceptance of Meter Reads by the Transporter".

Whilst the 10 day rule was enshrined within the code the fact that it was not implemented until relatively recently may have masked the importance of providing meter reads in a timely manner. The reasons for enforcing the 10 day rule are not up to debate, but the result caused a number of Shippers and Suppliers considerable problems. It is to the credit of the Transporters through xoserve that they accommodated temporary measures to alleviate the backlog in the transition period.

This proposal initially sought to extend the window to 20 days but following representations by xoserve in the Distribution Workstream it was agreed that the deadline should be 15 days. This compromise was reached to accommodate xoserve's concerns about the number of potential meter reads that might be submitted. It is to be hoped that when xoserve's systems are upgraded sometime in the next 12 months that the timescales can be extended further.

We believe that accepting more valid Meter Readings, implementation would facilitate more accurate allocation of energy and transportation charges between Users. It could also provide more timely re-allocation of energy and transportation charges through the RbD process. This would permit improved targeting of energy balancing charges and increase the cost reflectivity of Transportation Charges, thereby better facilitating achievement of the Code Relevant Objective of securing effective competition between relevant shippers.

A potential disadvantage that was identified was for the number of Meter Readings submitted in a day to exceed system capacity. It was clear from the discussions, which resulted in the 15 day timeframe being agreed that whilst this could always be a possibility the likelihood was slight. If it were to happen then xoserve have processes in place to manage the occasional excess. Consequently we do not believe

npower

Oak House
Bridgwater Road
Worcester WR4 9FP

T +44 (0)1905/34 05 21
F +44 (0)1905/34 04 88
I www.npower.com

Registered office:
Npower Limited
Windmill Hill Business
Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

Registered in England
and Wales no 3653277

that this should prevent the mod from being implemented at the earliest opportunity if approved.

We also agree with the proposer that allowing more Meter Reads into the system will improve the accuracy of the overall AQ review process. This can only be beneficial to the System as a whole as well as ensuring that Shippers costs are more correctly attributed.

I would be happy to discuss any of the issues raised with you.

Yours sincerely,

Simon Howe.
Gas Network Codes Manager