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Re: Proposed UNC Modification Proposal 0247: "Alignment of Interruption Application Rules for Annual and Ad Hoc Applications"

Dear Tim,

RWE Npower supports the above Proposed UNC Modification.

It seems pragmatic to allow the DNOs the option to tender for Interruption in Gas Years Y+1 through to Y+8 as this should provide a better picture of potential take up by Users and allow more efficient planning of any reinforcement work required on the Distribution Networks should take up be less than required.

Given that the accepted lead time for reinforcement of the network is some three years, we question how the DNOs would cope if, at Y+1, less than the required amount of Interruptible Capacity was tendered. However we are not greatly concerned about this as, given the amount of demand destruction that the market is experiencing on the back of the recession, it is unlikely that significant reinforcement will be required outside the few areas that are already constrained and it would seem logical that the DNOs would prioritise the acquisition of Interruption in these areas during the tender process.

In addition, benefits will derive to Users, Consumers and DNOs by virtue of not having to manage two separate processes as under the present rules.

If you wish to discuss any points raised in this response further, please do not hesitate to contact me.

Regards,

Chris Hill

Gas Codes Analyst

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