

Mr. Tim Davis
Joint Office of Gas Transporters
First Floor South
31 Homer Road
Solihull
West Midlands
B91 3LT

Your ref
Our ref
Name Chris Hill
Phone 0121 336 5224
Fax
E-Mail christian.hill@rwenpower.com

November 6, 2009

Re: Proposed UNC Modification Proposal 0255: "Publication of Objection Rates for LSP Supply Points"

Dear Tim,

RWE Npower supports the above Proposed UNC Modification.

We agree with the proposer that there is a considerable amount of anecdotal evidence that some Suppliers have on occasion objected to Supply Point Transfers in order to delay such a transfer so as to gain a commercial advantage, and it is hard to see how the current process provides any disincentive to such behaviour. In addition, this practice cannot be justified from the point of view of competition or benefit to the consumer. For a change of supply to take place, the consumer has presumably responded to a more attractive offer from another Supplier and it should not take the threat of switching for the incumbent Supplier to come up with a better offer than it was previously able to provide.

We are also in agreement with the view that the Modification should not seek to impose any kind of financial disincentive to such behaviour. Simply publishing the percentage of successful objections raised by each Supplier in comparison to the percentage of withdrawn objections should hopefully be incentive enough.

It is also the opinion of RWE Npower that the Proposed UNC Modification meets the relevant objective of securing effective competition between relevant Suppliers.

On the subject of cost of implementation, it seems appropriate that this be met by the Transporters as it does not appear to be of a sufficient level to justify the administration of a User Pays charge which could potentially be in excess of the actual implementation cost.

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

[npower](http://www.npower.com)

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