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Re: Proposed UNC Modification 0328: "Proposal to amend Annex A of the CSEP NExA by replacing the current version of the AQ Table"

Dear Tim,

On behalf of RWE Npower, I would like to thank you for the opportunity to respond to the above titled UNC Mod Proposal. Npower supports the implementation of the Draft Mod Report 0328. We believe that by amending Annex A, Part 8 of the CSEP NExA to reflect the revised Seasonal Normal Data (SND) carried out by DESC (and so applied effective October 1 2010) would ensure that the AQ values contained within the AQ Table remain fit for purpose which equally represent a reasonable estimate of the expected gas off take in accordance with house type and geographical location for domestic properties connected to an iGT Network.

In addition, as the proposer of Mod 099 in 2006 we also agree with the Draft Mod Report 0328 that the table contained within UNC TPD Section G, Annex G-3 is replaced to reflect the updated AQ Table as proposed. This would ensure that the BTU form is applied in a consistent approach and the whole process would be more effective.

By amending the CSEP NExA and updating UNC TPD Section G, Annex G-3 with the AQ values proposed within Draft Mod Report 0328 we believe its implementation would better secure competition by limiting the instances of inequitable allocation of charges owing to the misallocation of energy volumes. The implementation of Mod 0328 can only be beneficial in that its introduction would ensure the AQ values that are related to CSEPs are more accurately recorded and as such domestic Transportation Charges for Shippers iGT portfolios are more appropriately apportioned and levied.

Whilst fully in support of the proposal, Npower would like to see the iGTs fully engaged in the complete process of the development and future application of SNDs. This is a more prudent approach that ultimately should ensure that Shipper costs are more accurately attributed thereby encouraging and facilitating the securing of effective competition between relevant Shippers.

Should you wish to discuss any of the above please do not hesitate to contact me.

Regards,

Sham Afonja
Industry Codes Analyst

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