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Secretary, Modification Panel  
Joint Office

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**Modification Proposal 0189: Amendment to the QSEC Auction Timetable**

Dear Julian

Thank you for inviting us to comment on this modification proposal. This response is provided on behalf of the RWE group of companies, including RWE Npower plc and RWE Trading GmbH. We offer our support for implementation of modification proposal 0189.

We agree that there is merit in aligning obligated capacity release with the gas year and making full use of the capacity build period and that any observed auctions signals should improve the TBE process. What is more difficult for us to judge is the extent of any adverse impact caused by breaking the current alignment with National Grid's formula year. It is also unfortunate that there are a number of elements of the enduring entry capacity regime still remain to be finalised. Indeed this modification proposal is itself contingent on the outcome of the gas entry baseline re-consultation. Furthermore, absent capacity substitution, an April QSEC auction may result in investment in obligated entry capacity that may have been avoided with substitution in place.

However, on balance we believe that, in principle, proposal will improve the likelihood of incremental capacity being released in a timely manner as well as providing corollary benefits and on this basis we offer our support.

We hope these views are helpful and would be happy to discuss matters further.

Yours sincerely

*By Email So Unsigned*

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