

Representation

Draft Modification Report

0445 - Amendment to the arrangements for Daily Metered Supply Point Capacity

Consultation close out date:	18 July 2014
Respond to:	enquiries@gasgovernance.co.uk
Organisation:	RWE npower
Representative:	Amie Charalambous
Date of Representation:	18 July 2014

Do you support or oppose implementation?

Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

RWE npower would be supportive of the proposal to remove all references in the UNC to the Bottom Stop Supply Point Capacity. We feel that this modification would be beneficial for customers, providing an enduring solution that will allow for DM consumers to reset their capacity bookings on an annual basis. We believe that where a customer has reduced consumption but could not reduce capacity below the BSSOQ, we would consider this to be unfair and welcome a

permanent solution that provides a mechanism that enables it to be set it lower, otherwise, the customer would ultimately be penalised.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Be believe that the implementation of this modification would will better facilitate the achievement of the Relevant Objectives a, d (i), (ii) and (iii) as specified in the modification proposal

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

None

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Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

We are happy with the proposer's implementation lead time to coincide with project Nexus implementation date of 1st October 2015

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

No

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