

Representation

Draft Modification Report

0366 - Clarification of legal text for UNC Modification 0229

Consultation close out date: 11 March 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: npower
Representative: Jonathan Wisdom
Date of Representation: 10 March 2011

Do you support or oppose implementation?

Not in Support

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

npower wishes to see a fairer allocation of unidentified gas between the SSP and LSP sectors. The legal text of UNC Modification 0229 stated that cost identified by the AUGGE would be reallocated from April 2011 as specified within the original legal text. npower therefore cannot support a proposal that does not follow this but seeks to further push back the calculated expert view of unidentified gas. The current situation of cross subsidy between the LSP and SSP market is inequitable and measures to address this need to be brought in as soon as possible. Npower does not believe that the retrospective nature of this unfairly disadvantages the LSP market and in fact socialises the risk of unidentified gas that SSP Shippers deal with on a regular basis.

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

No.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As this modification potentially lengthens the time until an accurate reallocation methodology is applied we believe it does not further the relevant objectives.

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Version 1.0

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Impacts and Costs:

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

None on top of those identified within 0229.

Implementation:

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

None

Legal Text:

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

We are satisfied that the legal text satisfies the intention of the proposer.

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