

Representation

Draft Modification Report

0373: Governance of NTS connection processes

Consultation close out date: 30 March 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: RWE Npower plc / RWE Supply & Trading GmbH

Representative: Charles Ruffell

Date of Representation: 30th March 2012

Do you support or oppose implementation?

Support

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

The physical NTS connection is a key element in the development of new or enhancement of existing assets. We believe introducing a new connections framework into the UNC will make it more consistent, certain and transparent. Codifying the definition and content of a connection offer and including clear timescales, costs and deliverables at each stage will improve the process for all parties.

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

We believe that all relevant issues raised and discussed during the development process have been reflected in the Draft Modification Report.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that the implementation of a more consistent, certain and transparent connections process will have a positive impact on Code Relevant Objectives:

b) Coordinated, efficient and economic operation of

(i) the combined pipe-line system, and/ or

(ii) the pipe-line system of one or more other relevant gas transporters.

c) Efficient discharge of the licensee's obligations;

and

d) Securing of effective competition:

(i) between relevant shippers;

(ii) between relevant suppliers; and/or

(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers

Impacts and Costs:

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

None identified.

Implementation:

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

As this modification has been through lengthy and detailed industry development, we see no reason that implementation should be delayed.

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.

The schedule of charges required by the modification should be published in a timely manner.