

Representation

Draft Modification Report

0391: Distributed Gas Charging Arrangements

Consultation close out date: 03 August 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: RWE npower ltd
Representative: Jonathan Wisdom
Date of Representation: 03 August 2012

Do you support or oppose implementation?

Qualified Support

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

RWE npower agree with National Grid Distribution that suitable methods of allocating charges to new sources of gas within the distribution networks need to be implemented to both facilitate and encourage connection. Our main concern is that these should be implemented in a transparent manner and with sufficient notice given to the market so that competition is not distorted.

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?

We believe that it has a neutral impact on the objectives unless it is implemented without sufficient market notice in which case the impact becomes negative on objective (C)

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 would expect a minimum of three years lead time to allow the market to adjust to the new regime and potential knock on effects that adjusting the charges will have.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] 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.

Non