

## Representation

### Draft Modification Report

#### 0438S: Update of UNC TPD Section Y to reflect Exit Reform Arrangements

**Consultation close out date:** 07 February 2013

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** RWE Npower plc / RWE Supply & Trading GmbH

**Representative:** Charles Ruffell

**Date of Representation:** 06 February 2013

#### Do you support or oppose implementation?

Support

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

The changes set out under this Modification Proposal are necessary to update and make minor corrections to the NTS Transportation Charging Methodology contained in UNC TPD Section following the implementation of NTS Exit Reform.

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

No.

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

We agree implementation will have a positive impact on Code Relevant Objective(s):

c) Efficient discharge of the licensee's obligations,

as it should ensure that the UNC is consistent with the charging arrangements that NGT put in place from 1<sup>st</sup> October following full implementation of Exit Reform.

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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.

**Implementation:**

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

No reason not to implement as soon as possible following a Panel decision.

**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.