

Representation

Draft Modification Report

0444S: Changes to reflect demerger by APX of OCM Trading System Operator from the Trading System Clearer

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 UNC changes set out under this Modification Proposal will be necessary to reflect the separation of the Trading System Operator from the Trading System Clearer, following the proposed demerger by APX into two separate legal entities.

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):

f) Promotion of efficiency in the implementation and administration of the Code.

as it should ensure that the UNC is consistent with the legal position of the service provider.

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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?

Immediately after approval and subject to Ofgem's confirmation of Endex Gas Spot designation as Trading System Operator.

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.