

Representation

Draft Modification Report

0482S – Proposed Changes to Mod 81 Reports to be effective from 01/7/14

Consultation close out date: 30 May 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: RWE npower
Representative: Amie Charalambous
Date of Representation: 30 May 2014

Do you support or oppose implementation?

Support

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

RWE npower believe that if this modification is implemented, it will provide clarity & transparency around the changes in AQ's at the amendment stage of AQ Review & avoid some of the current confusion around the interpretation of this data.

We welcome the changes this modification is proposing as it will make the AQ Operational Meeting more representative of effective AQ amendment activity by Shippers and therefore produce a more accurate picture of energy movements by LDZ and market sector.

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

none

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 believe this modification will further relevant objectives (d) – securing of effective competition and (f) – promotion of efficiency in the implementation and administration of the Code as it will provide an accurate picture of energy movements by LDZ and market sector and provide transparency of the information provided.

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?

We are supportive of the implementation lead time as described in the modification of 1st July 2014

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