

Representation

Draft Modification Report

0353 - Population and Maintenance of the Market Sector Code within the Supply Point Register

Consultation close out date: 04 March 2011

Organisation: RWE npower

Representative: Amie Charalambous

Date of Representation: 04 March 2011

Do you support or oppose implementation?

Support/Qualified Support/Neutral/Not in Support/Comments* delete as appropriate

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

We believe that ensuring accuracy of data can only be a positive step and in this instance this modification would go some way to achieving this objective. If, as a consequence, completing blank MSC's would lead to more accurate AQ's and will aid the AQ process we would perceive this as making steps towards promoting effective competition between relevant suppliers.

We are pleased to see that a transitional period of 6 months has been introduced in order to give shippers a fair chance of correcting their blank MSC's. However, If each shipper had knowledge of their own individual volumes initially, it would have given each shipper a clearer view in assessing the full system/process costs.

We feel that by having this information beforehand would give greater clarity in assessing our support.

In general we are supportive of this modification and the principles behind it and therefore have no objection to it's acceptance

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

No

0353 Representation 04 March 2011

Version 1.0

Page 1 of 3

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe implementation of this modification would fulfil objectives C, D & F from a shipper perspective.

Impacts and Costs:

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

We would like to have an understanding of how many sites are relevant to us as a shipper, as well as a whole to the industry, this would clarify the extent of impacts and costs associated with the implementation of this particular modification

Implementation:

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

We would like to see a lead time of approximately 3 months prior to the implementation in order to make a full assessment of impacts and costs

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.

If each shipper had knowledge of their own individual volumes initially, this would have been advantageous, providing a clearer view in assessing the full system/process costs.

0353 Representation

04 March 2011

Version 1.0

Page 2 of 3



0353

Representation

04 March 2011

Version 1.0

Page 3 of 3

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