

Representation

Draft Modification Report

0521 - Revision of User Admission Criteria to include Transporter verification of its ability to transact with the Applicant User

Consultation close out date: 16 January 2015

Respond to: enquiries@gasgovernance.co.uk

Organisation: RWE Supply and Trading GmbH

Representative: Charles Ruffell

Date of Representation: 16 January 2015

Do you support or oppose implementation?

Support

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

We agree that the current User Admission criteria in the UNC should be amended to require confirmation of the Applicant User's capability to transact with the Transporter's Account Bank. This will reduce the risk to other network Users of being exposed to any unrecovered Energy Balancing and Transportation costs.

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

No.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that this modification would better facilitate Relevant Objective (d) better facilitating effective competition between relevant shippers, as it would minimise the risk of bad debt being incurred and recovered from other Users.

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 believe that this proposal should be implemented immediately following direction from the Authority.



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.

Nothing further.