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Dear Phil

Consultation on the compatibility of current planned UK Link downtime with UNC changes proposed in respect of the Nominations and Re-nominations processes at Interconnection Points, to ensure Great Britain's compliance with the new European Network Codes November 2014

We welcome the opportunity to respond to this Consultation. The comments are provided on behalf of RWE Supply and Trading GmbH and RWE Generation UK plc.

Our response to the consultation questions is set out below. Our view is that Option 2B should be implemented.

If you require any additional information or wish to discuss any aspects further, please do not hesitate to contact me.

Yours sincerely

By email so unsigned

Charles Ruffell
RWE Supply & Trading GmbH
Commercial Asset Optimisation UK

CONSULTATION QUESTIONS

1. Do you agree with the pros and cons of each option? If not please explain.

Generally yes, although it is unclear why, under Option 1, "*Renomination process is reduced by daily outage*" is a pro.

2. Are there any additional costs or benefits associated with any of the options identified?

The period towards the end of the gas day is a very active time for CCGT's responding to National Grid's power instructions, through on load BOA's but also early starts etc. Extending Gemini availability will align it with this period.

3. Do you believe that there are any other options that should be considered? If so, please provide details.

No.

4. Which option or options do you believe comply with the Interoperability Code requirement to minimise system downtime in the context of the Renominations process at IP points?

The Interoperability Code is vague in this regard. We believe that all options can be interpreted to comply but that the obligation to **minimise** ought to be taken as an aspiration to do better than simply retaining the current daily outages.

5. Which Option would you prefer to be implemented?

We support Option 2B. We believe that National Grid should strive to limit the number and duration of outages. With planned windows (Option 2A) they will fail to question whether they actually need an outage or not as they have already have time scheduled. When deciding between 2A and 2B we could do with an indication of how many outages National Grid actually envisage they might need. We do not think that Option 3 is practical, so the costs are not justified.

6. If you support option 2A, 2B or 3 would you consider User Pays to be the appropriate funding mechanism?

We understand that National Grid has received some funding under the RIIO-T1 price control process for EU market facilitation and this should be used. In any case, Gemini is a core User service and these proposals relate to availability of existing services rather than provision of additional services so should be centrally funded, potentially using the mid-point review as an opportunity to raise the funding issue.

7. Are there any other issues that you would like to highlight that have not been addressed within this Consultation document?

For the full benefit of the reduction in Gemini outage proposed in Option 2B, the OCM must remain open as well so that shippers can manage their imbalance position.