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23<sup>rd</sup> August 2013

Dear Lesley

### **ENTRY CAPACITY RELEASE METHODOLOGY STATEMENT - Consultation**

Thank you for the opportunity to comment on this consultation. This response is provided on behalf of the RWE group of companies, including RWE Supply and Trading GmbH and RWE Npower plc.

The consultation sets out the main drivers for updating the Statement at this time. These include extending the Statement to incorporate the release of non-incremental entry capacity and reflecting the revised RIIO-T1 Licence conditions, rather than making material changes at this time.

Overall, the draft Statement contains a clear explanation of the mechanisms that National Grid Gas will utilise to release both Obligated and Incremental entry capacity. The table in the Appendix and the accompanying explanations are helpful in understanding the proposed changes. We also welcome National Grid Gas' efforts to align the Statement with the new licence and UNC terminology.

We agree with National Grid Gas that it is appropriate to bring forward this review in order to minimise the overlap with the review and consultation process for the ECR that will be necessary should UNC Modification Proposal 0452<sup>1</sup> be implemented. There is a large volume of changes proposed in this current consultation and it makes sense to incorporate these before consulting on changes required by 0452.

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

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<sup>1</sup> Introduction of the Planning and Advance Reservation of Capacity Agreement (PARCA)