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MFM-D

Your ref.	
Your letter	
Our ref.	
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Swindon, 15/12/2023

Consultation on Interconnector's Access Rules and Charging Methodology

Dear Sarah.

RWE Supply & Trading (RWEST) welcomes the opportunity to respond to the above consultation. Our response is not confidential and can be published on Interconnector's website.

We support the proposals to include provisions for the sale, delivery, purchase and offtake of own use gas directly within the IAA and to introduce a reprofiling service. However, as the reprofiling service applies to a whole gas year and due to the discount shippers get for holding capacities in both directions, we are unsure the extent to which shippers will want to make use of it, as they may prefer to keep both products for use in certain seasons.

With regard to the changes to the gas quality arrangements, whilst these provide an extra degree of clarity, the fundamental problem remains that shippers are fully exposed to costs (both direct and indirect) arising from off-spec gas being shipped through the interconnector, despite having no realistic control over the gas fed into it by interconnected networks. This is an issue which ultimately needs to be addressed at European level, hence we recognise the difficulties associated with Interconnector doing this on a unilateral basis. We also recognise the motives behind increasing the number of long-term planned maintenance days, the clarification of force majeure arrangements and the other key changes to the boilerplate terms and conditions.

However, we strongly oppose the proposed amendments to Interconnector's pricing publication timetable. Notwithstanding the fact that Ofgem and CREG approved a derogation from Articles 11.8, 12.6 and 13.6 of the Capacity Allocation Network Code (CAM NC), which we did not support, to allow Interconnector to continue selling capacity through implicit allocation up to 3 days

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before the yearly, quarterly and monthly CAM NC auctions, reducing the period for publishing prices applicable in those CAM NC auctions to 3 days is unacceptable. We believe that the reserve prices and multiplier caps used in those auctions should continue to be published in accordance with the notice periods specified in the derogated articles. This maintains the integrity and consistency of the CAM NC auction process and ensures shippers have sufficient time to prepare their bidding strategies based on accurate prices, and to update and test their internal systems which rely on such prices. 3 days is nowhere near long enough to do this and will present unwelcome operational challenges for Interconnector's shippers.

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Yours faithfully,



Steve Rose
Head of Gas Market Design & Regulation
RWE Supply & Trading GmbH



Konrad Keyserlingk
Senior Expert Regulatory Affairs
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