

iGT UNC Representative
Gemserv Ltd
7th Floor,
Centurion House,
24 Monument Street,
LONDON,
EC3R 8AJ

31st August 2007

Modification Proposal iGT008;
"Creation of an Ancillary Document to the iGT UNC as a home for operational documents and procedures in the iGT UNC and its governance arrangements"

Dear Sirs,

Thank you for inviting us to comment on this modification. RWE npower fully supports the implementation of this modification proposal, as we believe it will help to improve the governance surrounding the interface between Users and iGTs.

With the development and growth of the iGT market, we feel that it appropriate that both operational procedures and documents including change management processes be stored in a central location. This will provide clarity to all Users and potential new entrants into the market of which operational procedures should be followed. Having this transparency will allow all parties the opportunity to effectively manage their businesses thus facilitating competition within the iGT market.

On occasions, iGT participants have had difficulties in ascertaining which processes to use, this has been further complicated by the plethora of different operational procedures being stored in disparate places. We believe that the Ancillary Document is a pragmatic way to deal with such issues.

We are pleased to note that the Ancillary Document will be subject to the governance arrangements of the iGT UNC. This will give confidence to all current and new iGT participants that any changes will be fully considered and agreed before being implemented.

We further believe that the establishment of an Ancillary document will help the innovation and development of the iGT market. It will enable iGT parties to be confident that their change proposals are drafted against the current procedures and also act as a depository for any further initiatives.

For the reasons above, we believe that this modification proposal should be implemented.

Please contact me if you wish to discuss any matters raised within this response.

Yours sincerely

Heidi Martin
Gas Network Codes Analyst