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**Modification Proposal to the Use of System Charging Methodology
GB ECM- 05 to cater for manifest data errors in the calculation of TNUoS tariffs
Consultation**

Dear Craig,

Thank you for the opportunity to respond to the above consultation. The following comments are provided on behalf of RWE Trading GmbH, RWE Npower plc, Great Yarmouth Power Ltd, Npower Cogen Trading Ltd, Npower Commercial Gas Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd.

RWE npower support the introduction of a mechanism to cater for manifest errors.

We note NGET's ongoing commitment to ensuring any such manifest errors are eradicated or at least minimised going forward. Given the unusual circumstances of the only identified error thus far, it is to be hoped that these arrangements may never be tested in practice.

It is important for all Users to have certainty over TNUoS liability once TNUoS tariffs are published, as Users will have entered into contractual positions on that basis. It is noted that charges will only be reconciled for Users who are eligible under the definition of materiality. We believe that the definition of materiality should be such that whilst directly affected Users will have their charges reconciled, which is the desired result, the majority of the remaining Users will not be eligible under the definition of materiality and so will be unaffected. This will minimise disruption. The suggested definition of materiality appears suitable but this can not be known for certain until and unless any further manifest errors occur.

Please feel free to contact me to discuss this reponse in more detail.

Yours Sincerely

Andy Manning
Transmission Charging Manager
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