



Marie Williams
Sustainable Energy Policy
Ofgem E-Serve
9 Millbank
London, Sw1p 3GE
Email: Sustainable.energy@ofgem.gov.uk

Your ref
Our ref
Name Jill Brown
Phone 01793 893598
Fax
E-Mail jill.brown@rwenpower.com

7th September 2012

Re: Ofgem's Discussion Paper on 'Strengthening strategic and sustainability considerations in Ofgem decision making'

Dear Marie,

We welcome the opportunity to express our interest in contributing to Ofgem's decision making process. This response is provided on behalf of RWE Npower plc.

We are keen to be engaged with the industry workshops this autumn, in order to be part of Ofgem's decision making processes with regards to sustainability considerations, and how in practice this area will be taken forward. We would have particular interest in contributing to discussions on those areas that would impact on code modification panels and industry technical groups.

We would also be keen to contribute to discussions surrounding the key tests that Ofgem are proposing, for looking at GHG emission implications in decision making. We feel these will need further discussion on how they are to be applied. Emissions from electricity generation have to be considered in the wider context of overall EU emissions. Whilst this is implicit in meeting the UK's GHG target, it is not clear that this has been recognised as part of the specific tests proposed. Following on from this, cumulative GHG emissions may be a robust indicator in terms of overall emissions, but there are no Government targets on cumulative emissions and the lack of any such targets on cumulative indicators would make it difficult to use as part of any impact assessment.

We have heard through Energy UK that Ofgem are holding a workshop on 25th October and we have since registered interest in attending this.

Yours sincerely,

Jill Brown
Economic Regulation Advisor

RWE npower
Trigonos
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB
T +44(0)1793/87 77 77
F +44(0)1793/89 25 25
I www.rwenpower.com

Registered office:
RWE Npower plc
Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

Registered in England
and Wales no. 3892782