

## Representation

### Draft Modification Report

#### 0469S - Transporter Gas Safety Visit Reporting

**Consultation close out date:** 09 December 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Wales & West Utilities Ltd.  
**Representative:** Richard Pomroy  
**Date of Representation:** 09 December 2014

#### Do you support or oppose implementation?

Support

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

The obligations under the Gas Safety Installation and Use Regulations relating to the isolation of service pipes rest with suppliers. We recognise that these are, in practice, performed by Transporters and that Shippers believe that the production of reports may assist in the identification of Unidentified Gas. We therefore support implementation of this modification.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

Implementation would further Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code.

#### Impacts and Costs:

*What analysis, development and ongoing costs would you face if this modification were implemented?*

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Version 1.0

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The draft modification report did not identify a User Pays Requirement and we do not wish to change this.

**Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

An implementation date cannot be determined until Xoserve have clarified requirements.

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

Yes

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*