

Joint Office of Gas Transporters
0091: Extending Uniform Network Code to allow Users to raise Class 3 UK Link modification proposals (Liz Spierling(Wales&West Utilities)For)

Representation For. 0091

"Extending Uniform Network Code to allow Users to raise Class 3 UK Link modification proposals"
Version 1.0

Date of Communication: 31/08/2006
External Contact: Liz Spierling(Wales & West Utilities)
Slant: For
Strictly Confidential: No

Abstract

Thank you for your invitation seeking representation with respect to the above Modification Proposal. Whilst the date for making submissions has passed, I hope that my representation can be considered.

Wales & West Utilities supports Modification Proposal 0091, on the assumption that all subsequent Class 3 Modification Proposals explicitly address the issues surrounding payment and implementation responsibility.

WWU believe that it is a good idea to eliminate the requirement for Transporters to raise Class 3 Modification Proposals (within the boundaries of using UK Link Systems) on behalf of Users. The Proposal does not identify the route that would be used to address payment and implementation responsibility for any subsequent Class 3 Modification Proposals. However we appreciate that this Proposal is an enabling Proposal and that any subsequent Class 3 Modification Proposals will necessarily have to address any associated issues regarding funding and implementation responsibilities.

WWU believes that the Proposal would promote efficiency in the administration of the UNC (SCC A11.1 (f)) and UK Link, by alleviating the Transporters from an obligation to raise Class 3 Modification Proposals on behalf of Users of which they have no involvement or authority over. It removes a layer of complexity that does not adversely impact with any contractual or regulatory obligations.

It would be desirable to receive clarification from the Proposer/UNC Committee regarding who should be responsible for any initial costs of any IS Impact Assessment (IA) required (and subsequent implementation cost concerns) by Class 3 Modification Proposals.

Regards

Liz Spierling
Commercial Manager, Transportation

Tel: 029 2027 8549
Internal: 78549 (Celtic Springs only)
Mobile: 07899 066294
E-mail: liz.spierling@wwutilities.co.uk
Wales & West House
Spooner Close
Celtic Springs
Coedkernew
Newport NP10 8FZ