

Mr Julian Majdanski  
UNC Panel Secretary  
Joint Office of Gas Transporters  
Ground Floor Red  
31 Homer Road  
Solihull  
West Midlands  
B91 3QJ  
[enquiries@gasgovernance.com](mailto:enquiries@gasgovernance.com)

Wales & West House  
Spooner Close  
Celtic Springs  
Coedkernew  
Newport NP10 8FZ  
T. 029 2027 8500  
F. 0870 1450076  
[www.wwutilities.co.uk](http://www.wwutilities.co.uk)

Tŷ Wales & West  
Spooner Close  
Celtic Springs  
Coedcernyw  
Casnewydd NP10 8FZ

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Dear Julian,

**Representation for Modification Proposal 0173: “Obligations to process data received from iGTs in line with requirements within Annex A of the CSEP NExA”.**

As the proposer of Modification Proposal 0173, WWU supports its’ implementation.

This proposal was raised because the legal text in respect of UNC Modification Proposal 0083, as implemented on 1 October 2006, did not accurately reflect the nature and intention of the original Proposal.

Management of the large Transporter and iGT relationship is governed by the Connected System Exit Point (“CSEP”) Network Exit Agreement (“NExA”), with the relationship between the CSEP User and the appropriate Gas Transporter governed by the relevant Network Code. iGTs are required under the terms of the CSEP NExA to submit timely updates to large Transporters to allow them to calculate output quantities, the proportion of transportation costs relating to large Transporters, to facilitate the reconciliation of Larger Supply Points as obliged under the terms of the UNC and to perform an AQ Review for all Larger and Smaller Supply Points.

The intention of Modification Proposal 0083 was to insert into the UNC requirements for the processing of data received from iGTs in a timely manner. Since implementation xoserve, as the Transporter Agent, have complied with the intent of that proposal. Mod 0173 intends to align the legal text with the intent in the following areas:

- The level of validation to be applied to CSEP AQ update and AQ review values;
- Acknowledgement of receipt of AQ review data by the large Transporters; and
- Acknowledgement of receipt of I&C NDM reconciliation data.

We hope these comments are helpful.

Yours faithfully

Liz Spierling  
Commercial Manager  
Wales & West Utilities