

Bob Fletcher
Modification Panel Secretary
Joint Office of Gas Transporters
31 Homer Road
Solihull
B91 3LT

Wales & West House
Spoooner Close
Celtic Springs
Coedkernew
Newport NP10 8FZ
T. 029 2027 8500
F. 0870 1450076
www.wwutilities.co.uk

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

7th October 2010

Re: UNC Modification Proposal 0328: “Proposal to amend Annex A of the CSEP NExA by replacing the current version of the AQ Table”

Dear Bob,

Thank you for the opportunity to comment upon this Modification Proposal. Wales & West Utilities Ltd (WWU) are **fully supportive** of the implementation of Modification Proposal 0328.

The Proposal

The Modification Proposal seeks to make changes to Annex G-3 of UNC TPD Section G and to the table in Annex A Part 8 of the standard LDZ CSEP NExA.

UNC TPD Annex G-3

The AQ table within Annex G-3 is used following the change of supplier process where the calculated AQ for a domestic property is of an erroneous nature. The AQ values contained within Annex G-3 are used to replace such erroneous AQs when no meter readings are available to calculate an appropriate AQ.

Annex A Part 8 LDZ CSEP NExA

The AQ table with Annex Part 8 is used to allocate an appropriate value to new CSEP Supply Points as no historic consumption information is available. This table contains the same values, and is used for the same purpose, as the AQ table contained within Appendix 1 Section CI of the iGT UNC.

Transporters have obligations under Section H of UNC TPD to review seasonal normal value of the composite weather variable at least every 5 years. Such a review has taken place in 2010 and the Transporters will be implementing revised values on 1st October 2010. The proposed changes to the two AQ tables referred to above will amend the AQ values to take account of the revised seasonal normal values. The proposed changes

24 hour gas escape number
Rhif 24 awr os bydd nwy yn gollwng

0800 111 999*

*calls will be recorded and may be monitored
caiff galwadau eu recordio a gellir eu monitro



have been checked by the Transporters Agent and we can confirm that the revised values have been applied appropriately.

Relevant Objectives

Amending the values within the AQ tables will ensure that the AQ values that are applied in both circumstances are likely to be more reflective of the actual gas usage at such properties. This will help to ensure that allocation of energy to Shippers will be more accurate. This will assist with furthering the relevant objective within Standard Special Condition A11 1(d), securing effective competition between relevant shippers / suppliers.

User Pays

We agree with the Proposer that this is not a User Pays Modification Proposal as it does not create or amend any User Pays Services.

Implementation

As this Modification Proposal only relates to updating values within the AQ tables with no system implications we would expect that it could be implemented immediately following a direction from the Authority. However, the Proposer has also raised a modification proposal to the iGT UNC and, subject to the necessary implementation directions by the Authority; it may be prudent to implement both proposals at the same time. Such a co-ordinated approach can be managed by the GTs and the iGTs via the Code Administrators.

Please do not hesitate to contact me should you have any questions concerning this representation.

Yours sincerely

{By email}

Simon Trivella
Commercial Manager
Wales & West Utilities
Tel: 07813 833174
E-Mail: simon.trivella@wwutilities.co.uk