

## Representation

### Draft Modification Report

#### **0326VV - Allocation of unidentified gas following the appointment of the Allocation of Unidentified Gas Expert (AUGE)**

**Consultation close out date:** 06 January 2012

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Wales & West Utilities Ltd

**Representative:** Simon Trivella

**Date of Representation:** 29 December 2011

#### **Do you support or oppose implementation?**

Neutral

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

Throughout discussions on this proposal we have been unable to identify the clear benefit of implementation and in particular how implementation will facilitate the relevant objectives. We have not indicated "not in support" and intend to base our decision on whether to support a Panel recommendation on consultation responses.

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

We have not identified any new issues.

#### **Relevant Objectives:**

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

We currently do not believe that the implementation of this proposal will have a positive impact on the achievement of the relevant objectives.

#### **Impacts and Costs:**

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

None

#### **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.*

We have nothing further that we wish to be taken into account.

Hopefully these comments are helpful to the Modification Panel and to the Authority; please do not hesitate to contact me should you have any questions relating to this matter.

Yours sincerely

*{By email}*

Simon Trivella  
Regulation & Commercial Manager  
Wales & West Utilities Ltd  
Tel: 07813 833174  
E-Mail: [simon.trivella@wwutilities.co.uk](mailto:simon.trivella@wwutilities.co.uk)