

Representation

Draft Modification Report

0400S: Removal of obligation to install duplicate Telemetry Equipment

Consultation close out date: 30 March 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **Wales & West Utilities**
Representative: Robert Cameron-Higgs
Date of Representation: 29 March 2012

Do you support or oppose implementation?

Support

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

The UNC currently obligates NG NTS to install its own duplicate Telemetry equipment at an NTS - DNO offtake, when the existing DNO equipment reaches the end of its service life. Duplicating facilities at these Offtakes as a matter of course, is inefficient investment and the removal of this mandatory requirement was a unanimous recommendation of the Enduring Distribution Network Arrangements (EDNA) project team. Should there be future occasions where the information provided by the GDN does not match the requirement of NG NTS, then NG NTS may opt to fit its own (duplicate) equipment.

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

0400S

Representation

20 February 2012

Version 1.0

Page 1 of 2

© 2012 all rights reserved

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

SSC A 11.1 (b) Co-ordinated, efficient and economic operation of

- (i) the combined pipe – line system, and/or (ii) the pipeline system of one or more other relevant gas transporters

NG NTS believe that there will be a reduction in costs resulting from the removal of this mandatory obligation to duplicate telemetry requirements at these offtakes (therefore being in line with efficient operation of the pipeline system). Automatically supplanting telemetry equipment at every offtake rather than on a business needs basis is inconsistent with this relevant objective.

Impacts and Costs:

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

NG NTS have quoted a value of £9M *savings* in its RIIO submission should this Modification Proposal be implemented.

Implementation:

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

Implementation consistent with the comments in the UNC Draft Modification Report

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.

No