

Representation

Draft Modification Report

0391: Distributed Gas Charging Arrangements

Consultation close out date: 03 August 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: Wales&West Utilities

Representative: John Edwards

Date of Representation: 03 August 2012

Do you support or oppose implementation?

Support

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

We believe this modification would have a beneficial impact on the development of Distributed Gas Schemes. It responds to government initiatives to facilitate the growth of low carbon energy supply and to Biomethane injection into gas distribution systems.

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

We have no additional issues to raise.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that all relevant objectives impacted by this proposal have been clearly stated in the modification report

Impacts and Costs:

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

Costs associated with system processes will be incurred by Xoserve and Transporters will incur the costs of dealing with Distributed Gas enquiries.

0391

Representation

06 August 2012

Version 1.0

Page 1 of 2

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Implementation:

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

We have no specific implementation date in mind except to say it should not be delayed until Xoserve have set up appropriate systems processes to accommodate this new charge. We believe the implementation date should be sooner rather than later and, if necessary, a temporary 'off line' billing process implemented in the short term to handle the relatively few Users.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] will deliver the intent of the modification?

We are satisfied with the legal text.

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 to add.