

**Representation - Draft Modification Report UNC 0648S**  
**End dating the revised DM Read estimation process introduced by**  
**Modification 0634**

**Responses invited by: 5pm on 27 April 2018**

**To:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Richard Pomroy
<b>Organisation:</b>	Wales & West Utilities Ltd
<b>Date of Representation:</b>	27 <sup>th</sup> April 2018
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

This modification removes a process introduced by modification 0634. WWU opposed that modification and we therefore support this modification 0648S. We support this modification because it removes a process that gave discretion to the CDSP which was contrary to the one of the principles of FGO arrangements introduced in April 2017.

**Self-Governance Statement:** *Please provide your views on the self-governance statement.*

We agree that this modification meets the self-governance criteria.

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

This modification should be implemented 16 working days after a panel decision to implement.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

None

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

**Please provide below any additional analysis or information to support your representation**