



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

6th May 2010

Re: UNC Modification Proposal 0288 “Facilitating the Reduction of Enduring Annual NTS Exit (Flat) Capacity by a value less than 100,000 kWh”

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 0288.

The Proposal

This Modification Proposal has been discussed and developed through the Transmission Workstream and has received universal support. The proposal is to remove the Minimum Eligible Amount requirement (100,000kWh) for all Capacity reduction requests. This will enable any User with an Enduring Annual NTS Exit (Flat) Capacity quantity that is less than 100,000 kWh at an NTS Exit Point, to reduce their Enduring Annual NTS Exit (Flat) Capacity quantity, at that NTS Exit Point, in the reduction window or via an ad-hoc reduction request.

If this Modification Proposal were not to be implemented then a User would be unable to reduce their capacity holdings at an Exit Point even though the capacity would not be required or utilised. We believe that this current restriction, and this potential scenario, is a unintended consequence of the implementation of Modification Proposal 0195AV. We therefore believe that this proposal presents a pragmatic solution to this and we are not aware of any disadvantages of implementation.

User Pays

We do not support this Modification Proposal being classified as a User Pays Modification Proposal as it does not create or amend any User Pays Services.

Relevant Objectives

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

Wales & West Utilities Limited
Registered Office:
Wales & West House, Spoooner Close, Coedkernew, Newport NP10 8FZ
Registered in England and Wales: No. 5046791



We believe that implementation of this Modification Proposal would better facilitate the following relevant objective:

Standard Special Condition A11.1 (d): so far as is consistent with subparagraphs (a) to (c) the securing of effective competition;

- (i) between relevant Shippers;***
- (ii) between relevant Suppliers; and/or***
- (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers;***

We support the Proposer's view that implementation of this Modification Proposal would lead to Users being able to surrender capacity that is not required and in turn only pay for the capacity they require, with more accurate cost allocation facilitating effective competition between Shippers (and therefore consistent with the better facilitation of this relevant objective, in particular A11.1(d) (i) and (ii).

If anyone has any questions relating to this representation then please do not hesitate to contact me.

Yours sincerely

{By email}

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