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Re: UNC Modification Proposal 0279 “Improving the availability of meter read history and asset information”

Dear John

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 0279.

Nature and intent of the Proposal

The Modification Proposal has two main elements;

1 – Creation of an annual report for Shippers

This Modification Proposal has been developed through the Distribution Workstream where Shippers have demonstrated the benefits of having access to historic metering information. The current arrangements prohibit Transporters from providing this information for periods where the Shipper was not the Registered User.

The report has been designed specifically for AQ Review purposes and should allow Shippers to be able to determine whether proposed AQs appear appropriate and whether any amendments need to be requested. The data may also help the Shipper to determine whether any other data (e.g. Meter asset information) has incorrectly impacted on consumption / AQ calculations and allow them to take the necessary steps to rectify this.

2 – Introduce general permissions for Transporters to release the relevant information

The Modification Proposal is not limited to the creation of an annual report and will introduce general permission for Transporters to release meter read history and asset information to the Registered User.

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

These permission changes will allow for future value added services to be offered by xoserve to Shippers via the Non-Code User Pays mechanism or on a bilateral basis. These services do not necessarily need to be limited to report form and, for example, could form part of future developments of other information provision such as the Internet Access to Data application.

There have been comments made that the annual report, that this Modification Proposal introduces, should also be available on an ad-hoc basis. This is in no way precluded and, with the proposed changes to permissions, reports could be made available in this way.

User Pays

xoserve have provided a Rough Order of Magnitude (ROM) cost assessment for this Modification Proposal and the detail is contained within the Draft Modification Report (DMR). We agree with the proposed cost allocation and development cost recovery mechanism.

Relevant Objectives

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;***

The Proposer has identified that having access to meter read history and meter asset information to enable a more thorough AQ review process than is currently the case. This would also ensure that incumbent Shippers and incoming Shippers (including new entrants) will have equal access to data to allow them to participate in AQ and other processes.

Therefore we believe that implementation of this Modification Proposal is entirely 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}

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