

Representation

Draft Modification Report

0314 - The provision of a "Data Update" to Non Code Parties

Consultation close out date: 25 February 2011

Organisation: First Utility

Representative: Chris Hill

Date of Representation: 25 February 2011

Do you support or oppose implementation?

Support

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

We feel that it is appropriate that the incoming supplier be given visibility of the equipment and commercial arrangements where AMR equipment is installed at an I&C site. This Modification, if implemented, should provide efficiency and cost reduction benefits in this situation.

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

No.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

First Utility believes that implementation of this Modification would better facilitate SSC A11.1(d) (i) the securing of effective competition between relevant shippers and SSC A11.1(d) (ii) the securing of effective competition between relevant suppliers.

Impacts and Costs:

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

No additional costs would be expected as a result of implementation.

Implementation:

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

We do not believe that any lead time would be necessary, implementation could be immediate upon receipt of approval from the Authority.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

NB: while formal legal text has not been provided, the Transporters have indicated that draft text will be published alongside this Report during the consultation period. Comments on this will be helpful when the text is finalised.

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