

Representation For. 0046

"Extension of the Sunset Clauses for Registration of Capacity at NTS Exit Points"
Version 1.0

Date of Communication: 12/09/2005
External Contact: Liz Spierling (Wales & West Utilities)
Slant: For
Strictly Confidential: No

Abstract

Dear Julian

Re: Modification Proposal 0046

Wales and West Utilities supports the implementation of Modification Proposal 046 "Extension of the Sunset Clauses for Registration of Capacity at NTS Exit."

Following the Authority's decision to delay the implementation of the enduring exit arrangements until September 2007, in parallel with new arrangements for DN interruptions, it is necessary to develop rules which address the interim period. The interim arrangements, developed by Transco NTS in conjunction with the industry, were deemed appropriate for the period up to 2008, prior to the determination made by the Authority. WWU is firmly of the view that the interim arrangements are valid for an extended period, providing the industry with a period of stability and permitting emphasis to be placed on developing the long-term, enduring arrangements.

WWU acknowledges the proposed timetable for NTS Offtake Capacity Registration over the transitional period and notes that although it appears challenging we are of the view that it is feasible.

WWU believes that this proposal furthers the code relevant objective, set out within Standard Special Condition A11.1b of the Gas Transporters Licence, of facilitating the co-ordinated, efficient and economic operation of the combined pipe-line system.

In addition WWU concurs with the views expressed by the Proposer that the proposal furthers the Relevant Objectives contained in Standard Special Conditions A11.1a and A11.1c for the reasons cited in the Draft Modification Report.

WWU believes that implementation of this modification enables the Transporter to comply with Safety Case obligations with respect to 5 year planning certainty and is consistent with the time periods Transco NTS requires to ensure that DN Offtake Requirements can be delivered.

Modifications to other documents have been proposed, by Transco NTS, and WWU will comment on these in due course.

Yours sincerely

Liz Spierling
Wales and West Utilities