

**Representation For. 0098**  
"Modification to Codify Emergency Curtailment Quantity (ECQ) Methodology"  
Version 1.0

**Date of Communication:** 01/09/2006  
**External Contact:** Liz Spierling(Wales & West Utilities )  
**Slant:** Against  
**Strictly Confidential:** No

**Abstract**

Thank you for the opportunity to respond to Modification Proposal 0098a. This response will also include comments relating to Modification Proposal 0098.

WWU supports the approach to governance described in 0098a, with straightforward changes being signed off by the UNC Committee and more complex changes requiring the UNC modification rules. This proposal will lead to the more efficient administration of the UNC.

WWU does not support the implementation of Modification Proposal 0098 for two reasons. Firstly it does not seem appropriate to ask the Authority to approve both a governance framework and a detailed methodology within one Modification. As stated previously, WWU agrees with incorporating the governance mechanisms within UNC.

The methodology proposed would require significant system changes to allow DN visibility of Daily Metered Component shipper nominations. The requirement to use these nominations appears to be a dual process to manage ECQ exposure which would be inefficient administration when the P70 and P70 (Firm) forms already exists.