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Dear Julian,

Representation for Modification Proposals 0139 and 0139A - Amendments to UNC TPD OCS Process and Long Term Allocation of Capacity in the Transitional Period

Wales & West Utilities support the implementation of 0139 but do not support the implementation of 0139A.

Proposal 0139

WWU agrees that creating a formal timetable which includes an agreed window in which National Grid NTS and DNO Users can potentially reconsider and resubmit Offtake Capacity statements is an enhancement to the existing process. The reduction in the length of the Application Window by 1 week (to July 24th), whilst increasing the time pressure on DNOs, is a legitimate trade off for the time allowed at the end of the process for Transporters to potentially amend some or all elements of requested flat capacity, flexibility capacity and/or associated Assured Offtake Pressures.

Proposal 0139A

WWU do not object to the principle of the above data being made available to Users for the reasons set out in the modification proposal. However in the interests of consistency across all exit points however we believe that the equivalent capacity booking criteria be made publicly available at the earliest practicable time for all exit points. For example, bookings for flat capacity made 12 months ahead of any 'enduring' period should similarly have such bookings made available for all parties to assess. The proposal sets out a number of options relating to how information could be provided e.g. Gemini, National Grid's website or hard copy. However no information is presented regarding the appropriateness of each option, which approach is preferred by Users, the timescales associated with each approach or the cost of each approach. WWU believes that further consideration of the proposal is required before a decision could be made.

Yours faithfully

Liz Spierling
Commercial Manager
Wales & West Utilities