

Mr Julian Majdanski
UNC Panel Secretary
Joint Office of Gas Transporters
Ground Floor Red
31 Homer Road
Solihull
West Midlands
B91 3QJ
enquiries@gasgovernance.com

Wales & West House	Tŷ Wales & West
Spooner Close	Spooner Close
Celtic Springs	Celtic Springs
Coedkernew	Coedcernyw
Newport NP10 8FZ	Casnewydd NP10 8FZ
T. 029 2027 8500	
F. 0870 1450076	
www.wwutilities.co.uk	

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Dear Julian,

Representation for Modification Proposal 0180/180V: “Replacement of file formats contained within Annex A Part 7 of the LDZ CSEP NExA”.

WWU **supports** implementation of UNC Modification Proposal 0180/180V.

The proposal is a result of industry discussion regarding the current and future arrangements of Unmetered LDZ CSEPs, led by Ofgem, involving the Large Gas Transporters (GTs), the Independent Gas Transporters (iGTs) and User representatives. This proposal does not seek to make any changes to current working practices but will clearly document and formalise them within Annex A part 7 of the CSEP NeXA making the process and requirements fully transparent.

The Proposer has submitted a ‘Variation Request’ for this Proposal; we believe this variation is immaterial as it is purely correcting the file formats within the Appendix of the Proposal to reflect the current arrangements. Regardless of whether the Modification Panel decide that this Variation is material or not, this Representation and our support will remain unchanged.

We agree with the Proposer that the implementation of this Modification Proposal can be expected to facilitate SSC A11 (f) of the GT Licence; so far as is consistent with subparagraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.

The data submitted by iGTs to DNOs, and vice versa, is critical in ensuring the timely and accurate flow of User portfolio, reconciliation volumes and AQ data; this has a direct impact on the Transportation Charges levied by the DNOs and reconciliation volumes that will flow into RbD.

This Modification Proposal has no implementation implications for any party other than Connected System Operators (CSOs). In this case, the CSOs are the iGTs that are already utilising the file formats contained within this Proposal. For this reason we are supportive of immediate implementation (subject to decision by the Authority).

We hope these comments are helpful.



Yours faithfully

Simon Trivella
Commercial Analyst
Wales & West Utilities