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15<sup>th</sup> January 2008

**Re: UNC Modification Proposal 0183 “Provision of data in respect of downstream networks by the iGT directly connected to the Distribution Network”**

Dear Julian

Thank you for the opportunity to comment upon this Modification Proposal, the implementation of which WWU **fully supports**.

We fully agree with the Proposer that the concept of ‘nested arrangements’ was not considered when the original CSEP NExA terms were agreed. These nested arrangements have steadily grown over time and now accounts for over 250 networks, these networks are likely to relate to many thousands of individual supply points. It is of great concern to us as a distribution Network Operator that the commercial and operational arrangements between the upstream and downstream iGT are unclear (and possibly non-existent) and as a consequence, we are not being furnished with timely or accurate information. Without this information we are unable to qualify the accuracy of our transportation charges or efficiently manage the network upon which these iGT networks are connected to.

There have been discussions at the Ofgem led iGT CSEP NExA meetings regarding an alternative solution to this Proposal, this involves the nested iGT submitting data directly to the Distribution Network Operator; we fully agree with the Proposer this arrangement would be wholly inappropriate. The relationship between us and the lead iGT takes the form of an upstream and downstream Transporter. The relationship between an iGT and any connected iGT should be no different, without a commercial relationship in place the upstream Transporter (be it a DNO/GT or an iGT) are not able to operate in an economic, efficient and safe way.

It has been highlighted in other Representation letters pertinent to this Proposal that the CSEP NExA may not be the most appropriate vehicle for such obligations as the downstream ‘nested’ iGTs are not party to the agreement. We acknowledge that this is the case but our contractual arrangements are only with the directly connected iGT. We also accept that the iGTs may need a suitable implementation lead time to put in place other governance arrangements covering the iGTs that are downstream to them, we would welcome further feedback from the iGTs on this prior to an implementation date being finalised. One Representation suggests that a modification to the iGT UNC would have been preferable; we agree that having obligations within the iGT UNC would

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put in place the necessary iGT to iGT obligations but see this as complimentary to this Modification and not an alternative option.

If you have any questions relating to this Representation please do not hesitate to contact me.

Yours sincerely

Simon Trivella  
Commercial Analyst  
Wales & West Utilities