

Julian Majdanski Joint Office of Gas Transporters 31 Homer Road Solihull B91 3LT Wales & West House Spooner Close Celtic Springs Coedkernew Newport NP10 8FZ

Tŷ Wales & West Spooner Close Celtic Springs Coedcernyw Casnewydd NP10 8FZ

T. 029 2027 8500 F. 0870 1450076 www.wwutilities.co.uk

15<sup>th</sup> January 2008

## Re: UNC Modification Proposal 0184 "Requirement for Partial Non-Business Days for the Purposes of the UK Link Technology Refresh (UKLTR) Project"

Dear Julian

Thank you for the invitation to comment upon this Modification Proposal, as the Proposer WWU **fully supports** its implementation.

We would like to this opportunity to respond to points that have been raised in representations from Users and other Distribution Network Operators.

We welcome the acknowledgement that this Proposal has distinct advantages over Modification Proposal 0179 in that the impact on users has been largely reduced by utilising 'partial non-Business Days' instead of 'non-effective days'.

Scottish & Southern Energy have raised a minor point regarding the availability of the Conquest system during the upgrade period, this has been taken up by the Transporters / xoserve and confirmation of arrangements for the Conquest system will be communicated shortly and can be discussed at the next UK Link Committee meeting.

We provided draft / suggested legal text alongside the Proposal and National Grid have kindly provided feedback within their representation. They have concerns as to whether the text accurately reflects the nature and intent of the Proposal. We have taken these comments on board and will discuss the text with National Grid and the other Transporters prior to providing the final legal text.

Due to the proposed implementation date of this Proposal we would like to suggest that an extra Modification Panel meeting is convened, prior to the 21 February 2008 meeting, to allow Ofgem sufficient time to consider.

We would also like to take this opportunity to thank all Transporters and Users that have supported the development of Modification Proposals 0179 & 0184 at Distribution Workstream and Uk Link Committee over the last few months.

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Yours sincerely

Simon Trivella Commercial Analyst Wales & West Utilities