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8<sup>th</sup> February 2008

### **Re: UNC Modification Proposal 0185 / 0185A “Meter Error Notification Process”**

Dear Julian

Thank you for the opportunity to comment upon these Modification Proposals. We are **not supportive** of the original Modification Proposal 0185 and offer **qualified support** for the Alternative Modification Proposal 0185A.

Wales & West Utilities were fully engaged and supportive of Review Group 0131 (LDZ RbD Reconciliation Notification Process) that preceded the current Modification Proposals. Along with the other Gas Transporters we made a commitment to take forward the output from Review Group 0131 and develop detailed business rules / guidelines in order for a suitable Modification Proposal to be raised. The intention was to utilise the Offtake Arrangements Workstream to develop and consult on the relevant documents and produce a Modification Proposal that had the full support of the industry.

Unfortunately Modification Proposal 0185 was raised by EDF prior to this work being completed, this led to the Alternative Proposal 0185A being raised by NG Distribution in an attempt to better reflect the work that the Transporters had carried out. A number of issues have arisen with the original Modification Proposal 0185 and the Proposer has since indicated that a material variation will be required. Not all the issues with 0185 have been fully addressed within Modification Proposal 0185A, mainly due to the time constraints associated with Alternative Proposals. Due to these issues, and conflicting elements within the two sets of guidelines, we offer qualified support for Proposal 0185A and but can not support Proposal 0185.

We believe there is still a desire to produce a fully supported single Modification Proposal and have today requested that an Offtake Arrangements Workstream meeting is convened within the next week. We are hopeful that either a variation to one of the existing Proposals, or an entirely separate Proposal, can be produced in time to be considered at the 21<sup>st</sup> February 2008. The main areas that need development are the differences between the two sets of guidelines and the associated changes that will be required within the UNC Offtake Arrangements Document.

24 hour gas escape number  
Rhif 24 awr os bydd nwy yn gollwng

**0800 111 999\***

\*calls will be recorded and may be monitored  
caiff galwadau eu recordio a gellir eu monitro

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

Yours sincerely

Simon Trivella  
Commercial Analyst  
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