

Julian Majdanski  
Joint Office of Gas Transporters  
31 Homer Road  
Solihull  
B91 3LT

Wales & West House  
Spooner Close  
Celtic Springs  
Coedkernew  
Newport NP10 8FZ  
T. 029 2027 8500  
F. 0870 1450076  
[www.wwutilities.co.uk](http://www.wwutilities.co.uk)

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

22<sup>nd</sup> April 2008

**Re: UNC Modification Proposal 0185VV “Meter Error Notification Process”**

Dear Julian

Thank you for the opportunity to comment upon this Modification Proposal, I can confirm that we are fully **supportive** of its implementation.

**1. The Modification Proposal**

Modification Proposal 0185VV has been raised as a result of the work carried out within Review Group 131 and, following feedback from Transporters, from the Modification Proposals 0185 and 0185A. We have been entirely supportive of this development work and believe that it establishes a transparent meter error notification process that allows the appropriate dissemination of information, and engagement, with affected parties.

The Proposal also allows for the necessary changes to be made within the Offtake Arrangements Document that avoid conflicts in process and puts in place the appropriate trigger points for the notification process. The inclusion of the guidelines document within UNC as a related document provides an appropriate level of governance, it ensures that future changes can be managed in a timely manner with the necessary consultation and approval by the UNCC.

**2. Extent to which implementation of the proposed modification would better facilitate the relevant objectives**

**Standard Special Condition A11.1 (a): the efficient and economic operation of the pipe-line system to which this licence relates;**

We do not believe the Proposal will better facilitate this relevant objective

**Standard Special Condition A11.1 (b): so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters;**

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

We do not believe the Proposal will better facilitate this relevant objective

***Standard Special Condition A11.1 (c): so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence;***

We do not believe the Proposal will better facilitate this relevant objective

***Standard Special Condition A11.1 (d): so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers;***

We agree with the Proposer that implementation of this Proposal will establish a far more formalised and robust process for the notification of LDZ Offtake meter errors. This will provide additional certainty for Users and therefore may be expected to better facilitate this relevant objective.

***Standard Special Condition A11.1 (e): so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards (within the meaning of paragraph 4 of standard condition 32A (Security of Supply – Domestic Customers) of the standard conditions of Gas Suppliers' licences) are satisfied as respects the availability of gas to their domestic customers;***

We do not believe the Proposal will better facilitate this relevant objective

***Standard Special Condition A11.1 (f): so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.***

By having a more formal and robust meter error notification process in place will reduce the length of time between discovering a meter error to the time that the subsequent reconciliation takes place. The process will be more transparent than current arrangements and will provide greater assurance to Users that Transporters are taking the appropriate actions to accurately assess and correct meter errors. We believe that this will assist with the promotion of efficiency in the administration of the uniform network code.

#### ***4. The implications for Transporters and each Transporter of implementing the Modification Proposal, including:***

##### ***a) Implications for operation of the system***

We do not believe that implementation of this Proposal will present such implications

##### ***b) Development and capital cost and operating cost implications***

Transporters may face an increase in operating costs as they may be required to appoint an independent expert.

##### ***c) Whether it is appropriate to recover all or any of the costs***

No cost recovery would be necessary

***d) Analysis of the consequences (if any) this proposal would have on price regulation***

We do not believe there would be any consequences on price regulation from the implementation of this Proposal.

***6. The development implications and other implications for the UK Link System of the Transporter, related computer systems of each Transporter and related computer systems of Users***

There would be no implications for the UK Link System of the Transporters.

***10. Analysis of any advantages or disadvantages of implementation of the Modification Proposal***

***a) Advantages***

We agree with the Proposer that implementation of this Proposal will give Users greater assurance that the procedures carried out by Transporters, in relation to meter errors, are appropriate. The notification process will provide Users with an early view on the potential magnitude of such errors and the opportunity to follow the progress of any meter error through the revised procedures.

***b) Disadvantages***

We agree that there may be an increased cost to manage future changes; however, we believe this will be an infrequent event. Any impact would be minor and far outweighed by the benefits of having the appropriate governance arrangements in place.

***15. Proposed implementation timetable (including timetable for any necessary information systems changes and detailing any potentially retrospective impacts)***

In order to put the necessary reporting procedures in place, and to establish a suitable list of experts, it is likely that a period of up to four or five months, following a decision by the Authority to implement this Proposal, would be required.

***19. Legal Text***

We believe that the legal text that has been provided accurately reflects the nature and intent of the Proposal.

Hopefully these comments have been helpful, if you have any questions relating to this Representation then please do not hesitate to contact me.



Yours sincerely

Simon Trivella  
Commercial Analyst  
Wales & West Utilities