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8th February 2008

Re: UNC Modification Proposal 0193 “Removal of Certain “Gas not made available for offtake” Provisions from the UNC”

Dear Julian

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

The proposed changes to The Gas (Standards of Performance) Regulations, that will come into effect on 1st April 2008, will effectively duplicate the compensation arrangements for failure to supply gas that are set out in UNC TPD J3.5.2 and J3.11.6(a). Implementation of this Modification Proposal will remove this duplication of governance and liability. We are in agreement with the Proposer that as a consequence of this the Group Limit for Compensation Group J (in respect of Smaller Supply Points as detailed in UNC TPD Section V10(e)(vi)) also needs to be removed.

Whilst we agree that this Modification Proposal makes the necessary changes to account for the revised Regulations, we do feel that other areas of UNC TPD Section V3.5 (namely 3.5.5) and the entire Section V 3.11 need to be reviewed; we no longer believe they are fit for purpose. This is an entirely separate exercise and should not impact on the implementation of this Modification Proposal. The iGT UNC will also require review / modification as The Gas (Standards of Performance) Regulations apply equally to iGTs, we are more than happy to assist with any such review.

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

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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