



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

Wales & West House
Spoooner Close
Celtic Springs
Coedkernew
Newport NP10 8FZ
T. 029 2027 8500
F. 0870 1450076
www.wwutilities.co.uk

Tŷ Wales & West
Spoooner Close
Celtic Springs
Coedcerryw
Casnewydd NP10 8FZ

5th June 2008

Re: UNC Modification Proposal 0202 “Improvement to More Frequent Readings Provisions to allow benefits of AMR”

Dear Julian

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

We are supportive of industry initiatives that seek to embrace new and affordable technology that has the potential to be of benefit to end consumers and promote greater energy efficiency within the gas industry.

Although supportive of this Proposal we do not fully agree with the benefits to Gas Transporters that are identified within the Draft Modification Proposal or that have been included in other Representations to this Proposal.

Notwithstanding this there are sufficient benefits to the wider community that implementation of this Proposal would deliver. We do agree with the Proposer that through implementation of the Proposal there is the potential to improve cost reflectivity and this would better facilitate the relevant objective of the securing of effective competition between relevant shippers.

It is likely that the Supply Points at which a User would wish to install and utilise AMR technology are already supplying regular reads in line with current UNC requirements. Implementation may allow increased reads to be submitted for this population but it is unlikely to have any significant impact on the 4 million Supply Points that fail to have their AQ's recalculated each year. Nor will it decrease the thousands of Supply Points that are unregistered / 'shipperless' within the Supply Point Register and subsequently will do little to reduce the amount of energy allocated to the RbD

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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Registered Office:
Wales & West House, Spoooner Close, Coedkernew, Newport NP10 8FZ
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market. We believe it is key for the industry to not only be developing improvements in meter reading for certain market sectors but also to ensure that the fundamental processes that currently exist for all Supply Points are adhered to and improved upon.

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