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Dear Julian,

Representation for Modification Proposal 0207: Change to Telemetry Requirements in OAD for SOMSA Exit

Wales and West Utilities gives **qualified support** for implementation of this Modification Proposal. We agree with the proposal in principle but have some concerns about the suggested legal text.

The proposal is required to facilitate exit from the System Operator Managed Services Agreement (SOMSA) which was put in place at the time of DN sale. Following SOMSA exit, the Transitional Provisions in OAD Section E 3.1 will no longer apply and National Grid NTS will no longer have a right of access to, and right of use, of DNO Telemetry at each Offtake. NTS would be required to provide its own NTS Telemetry Facilities. Whilst we agree with the Proposer that it would more economical and efficient for NTS to continue to have access to information provided from existing DNO telemetry equipment, until such time as it is replaced, it is important that obligations remain clear:

- It should be clear in the legal text that obligations to continue to provide information should be on a like for like basis i.e. DNOs would only be obliged to continue to provide information as currently received by NTS.
- Our interpretation of the Modification Proposal was that "end of service life" includes economic, operational and physical considerations. However the suggested legal text appears to be more restrictive. We believe clarification is required as it would be inappropriate to restrict a DNOs operational or commercial discretion following SOMSA exit.

In summary we believe that subject to clarification through amendments to legal text, implementation of the above Modification Proposal could better facilitate relevant objective A11.1 (a), the efficient and economic operation of the pipeline system by allowing National Grid NTS to progress with a phased programme for installation of telemetry and control systems.

Should you require any further information, please contact me on 02920 278549 or liz.spierling@wwutilities.co.uk

Yours sincerely

Liz Spierling
Commercial Manager