



Bob Fletcher
Modification Panel Secretary
Joint Office of Gas Transporters
31 Homer Road
Solihull
B91 3LT

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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
Coedcernyw
Casnewydd NP10 8FZ

Re: UNC Modification Proposals 0319V, 0322V, 0323V, 0324V and 0325V (Implementation of Ofgem's Code Governance Review)

Dear Bob,

Thank you for the opportunity to comment upon these Modification Proposals. Wales & West Utilities Ltd (WWU) are **fully supportive** of the implementation of these Modification Proposals and would like to make the following comments.

UNC Modification Proposals 0319V, 0322V, 0323V and 0325V

These Modification Proposals were varied during the previous Consultation Phase to take account of general comments received and comments following a review of the suggested legal text. WWU is supportive of all of these Modification Proposals variations and the comments in our previous representation still apply.

UNC Modification Proposal 0324V

Our previous representation did not contain comments for Modification Proposal 0324 due to it having an extended consultation period. As with the proposals mentioned above, we are entirely supportive of the implementation of this Modification Proposal and believe that it fully implements the requirements placed upon gas transporters through the amended A11 licence condition.

There is a degree of concern from industry parties that the concept of Significant Code Reviews, and more specifically the ability of Ofgem to direct transporters to raise Modification Proposals, needs to be addressed. Whilst we share some of these concerns we believe this is a matter for further industry discussion and should not prevent the implementation of Modification Proposal 0324V.

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

Wales & West Utilities Limited
Registered Office:
Wales & West House, Spoooner Close, Coedkernew, Newport NP10 8FZ
Registered in England and Wales: No. 5046791



We understand that the Proposer will be issuing amended suggested text for all the above Modification Proposals prior to the 5th November 2010. Once we have reviewed the suggested text we will feed any comments we have directly back to the Proposer.

WWU believe each proposal satisfies the 'relevant objectives' as referenced our previous representation and as specified by the Proposer in each individual Modification Proposal.

Please do not hesitate to contact me should you have any questions relating to this matter.

Yours sincerely

{By email}

Simon Trivella
Commercial Manager
Wales & West Utilities
Tel: 07813 833174
E-Mail: simon.trivella@wwutilities.co.uk