

Representation

Draft Modification Report

0362 - Use of 'notional Meter Readings' and 'Agreed Opening Meter Readings' for Individual CSEP Reconciliation

Consultation close out date: 19 May 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: **Wales & West Utilities Ltd**
Representative: Simon Trivella
Date of Representation: 19 May 2011

Do you support or oppose implementation?

Fully Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

Allowing the use of notional Meter Readings and Agreed Opening Meter Readings will allow for a greater number of individual CSEP reconciliations to take place. This should therefore improve cost allocation of energy to the appropriate parties.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

We have not identified any new or additional issues to be recorded in the Modification Report.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

We agree that this Modification Proposal is suitable for self-governance.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the Proposer that implementation of this modification will further the achievement of relevant objective A11.1(d) (*“the securing of effective competition between Shippers”*) by way of a greater accuracy in cost allocation.

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

As a Large Transporter we would not incur any implementation or ongoing costs if this modification were to be implemented.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

This modification could be implemented immediately after the 15 day appeals window that follows the self-governance decision by the panel.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

There will be no changes to the UNC as a result of implementation of this modification. All changes will be made within the generic LDZ CSEP NExA and we believe the suggested amendments within the proposal are fit for purpose.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

We have nothing further that we wish to be taking into account.