

## Representation

### Draft Modification Report

#### 0367 - Interruptible to Firm – Supply Point Transition

**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.

Modification Proposal 0367 has been raised to facilitate the transition from interruptible to universal firm for existing interruptible Supply Points. Implementation of this modification proposal will ensure a smooth transition for all Supply Points and utilises existing processes in order to achieve this. Where Shippers are unable to do this the modification allows for the Transporter Agency to carry out necessary activities on the Shipper's behalf.

#### 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 for inclusion 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 do agree with the Modification Panel that this proposal should be treated as a self-governance modification.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

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Implementation of this modification will better facilitate relevant objective A11.1(f) of the transporters' licence ("Promotion of efficiency in the implementation and administration of the Code") as it will ensure that all existing Interruptible Supply Points become Firm Supply Points in the most efficient way. The additional back stop service, that will be carried out by the Transporter Agency, ensures that where a Shipper is unable to complete the transition for any Interruptible Supply Point that this will not prevent the transition taking place.

### **Impacts and Costs:**

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

The central system costs associated with the modification proposal will be paid for by the Gas Distribution Networks. As this is a modification only applies to the transition period there will not be any ongoing costs.

### **Implementation:**

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

As this is a self-governance modification proposal we believe it can be implemented immediately following the 3 week appeals window that follows the modification Panel decision.

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

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

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