

D 03Representation

Draft Modification Report

0375 – Changes to how Unsecured Credit Limits are determined within UNC TPD Section V 3.1.7 (Independent Assessments)

Consultation close out date: 09 December 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: Wales & West Utilities Ltd
Representative: Simon Trivella
Date of Representation: 09 December 2011

Do you support or oppose implementation?

Support

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

As the proposer of this modification, we are fully supportive of implementation. Removing the use of an Independent Assessment Score with the link to the Transporter's Maximum Unsecured Credit Limit will mean that the a User's Unsecured Credit Limit, when using an Independent Assessment, will be based solely on the credit value recommended in the report. In practice, the credit value is consistently the lower value and, in our opinion, is the appropriate value to be used to set a User's Unsecured Credit Limit. Therefore, we are fully supportive of implementation of this modification as it will simplify this process without any detrimental impact to Users.

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

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

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe that removing a complicated process from the UNC, that is not appropriate and has never been utilised to determine a User's Unsecured Credit Limit, will better facilitate the achievement of relevant objective A11.1(f) of our transporter licence.

Impacts and Costs:

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

We would not face any development or ongoing costs if this modification were to be implemented. There may be marginal administrative cost savings due to the process being simplified (e.g. less User queries about the 'lesser of rule' calculation).

Implementation:

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

There is no set lead time required for implementation of this modification but would agree with National Grid NTS that the 1st of the month following a direction from the Authority would seem a reasonable implementation date.

Legal Text:

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

We have made some slight changes to the legal text during the Workgroup discussions, we are satisfied that the version contained within Draft Modification Report delivers the intent of the modification.

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.

There is nothing further that we wish to have taken into account.

Hopefully these comments are helpful to the Modification Panel and to the Authority; please do not hesitate to contact me should you have any questions relating to this matter.

Yours sincerely

{By email}

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