

Representation

Draft Modification Report

0387 - Removal of Anonymity from Annual Quantity Appeal and Amendment Reports

Consultation close out date: 06 January 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: Wales & West Utilities Ltd
Representative: Simon Trivella
Date of Representation: 29 December 2011

Do you support or oppose implementation?

Neutral

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

Throughout discussions on this proposal we have been unable to identify the clear benefit of implementation and in particular how implementation will facilitate the relevant objectives. We have not indicated "not in support" and intend to base our decision on whether to support a Panel recommendation on consultation responses.

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

We have not identified any new issues.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We currently do not believe that the implementation of this proposal will have a clear positive or negative impact on the achievement of the relevant objectives.

Impacts and Costs:

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

Implementation would not lead to any development or ongoing costs for WWU. There would be minimal changes required to central systems / reporting and this would not lead to any material incremental costs, we therefore agree with the proposer that this is not a User Pays proposal.

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Legal Text:

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

Yes.

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 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}

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