

Representation

Draft Modification Report

0390 - Introduction of a Supply Point Offtake Rate Review and Monitoring Process

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?

Support

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

We are fully supportive of implementation of this modification as we agree with the proposer that it will help to ensure appropriate investment signals are received by the DNs and that capacity on the network is available to those Users / end consumers that may require it. This would support DNO compliance with licence obligations in respect of efficient and economic network development and support effective competition between Users (Shippers).

We would also like to take the opportunity to point out that, and to again agree with the proposer, that:

"It is not the intention of this UNC Modification proposal to cause SPORs to fluctuate on an annual basis linked to actual usage, but to ensure the SPOR is an accurate reflection, year on year, of potential maximum hourly capacity requirements."

Implementation of this proposal may also help to identify where Supply Capacity Requirements (SOQ) are not sufficient for a site (or are excessive). This has proven to be a particular issue so far this winter with an above average number of Supply Points incurring Supply Point Ratchet Charges.

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

We have not identified any new issues.

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Version 1.0

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the reasoning we provided in the original modification proposal that implementation should be expected to further the achievement of relevant objectives (a), (c) & (f).

Impacts and Costs:

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

Implementation would not lead to any significantly material development or ongoing costs for WWU.

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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