

Representation

Draft Modification Report

0401S: Amendments to the provisions for agreeing pressures at the Offtakes from the National Transmission System to Distribution Networks

Consultation close out date: 30 March 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **Wales & West Utilities**
Representative: Robert Cameron-Higgs
Date of Representation: 30 March 2012

Do you support or oppose implementation?

Comments

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

We are supportive of the principles underpinning this proposal. Targeting key Significant Offtakes which benefit both Transporters operation is appropriate. We are not convinced however that the proposals will necessarily promote any increased efficiency in the administration of this area of the Code. The requirement for DNO's to monitor and specify 'Significant' Offtakes to satisfy certain conditions may be less efficient than the current arrangements. The proposal may have merits however for those Transporters electing to use it, and a DNO can create the same working arrangements as now by specifying all its offtakes as Significant Offtakes.

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

No

Self Governance Statement:

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

Yes

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16 February 2012

Version 1.0

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

It is unclear whether the relevant objective 'Promotion of efficiency in the implementation and administration of the Code' would be advanced by this proposal.

Impacts and Costs:

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

None

Implementation:

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

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.