

## Representation

### Draft Modification Report

#### **0441: Continuation of Daily Metered (Voluntary) service until the implementation of Project Nexus**

**Consultation close out date:** 07 June 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Wales & West Utilities  
**Representative:** Robert Cameron-Higgs  
**Date of Representation:** 07 June 2013

#### **Do you support or oppose implementation?**

Not in Support

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

Modification 0441 seeks to extend the date and provisions set out in Modification proposal 0345. The basis of our lack of support for this proposal is that there is no evidence available which supports the assertion that DME is not a viable alternative to DMV. We would expect evidence that a procurement process had taken place and that no viable service providers had been identified. The points raised in Modification 0345, and indeed much of Ofgem's decision letter are still relevant, and on that basis we conclude that Modification 0441 should not be implemented.

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

No

#### **Relevant Objectives:**

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

Implementing proposal 0441 will not further relevant objective (f) since implementation will not retain an earlier change of contractual provision that is incentivised by competitive pressure rather than liabilities.

Similarly by implementing 0441, relevant objective (d) is not met since it continues to restrict new service providers from entering the market.

#### **Impacts and Costs:**

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

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WWU's fixed costs would remain constant in the short term, but we would continue to carry the risk of UNC liabilities in this area, beyond the date agreed by UNC Modification 0345.

**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 [and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS))] will deliver 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.*

No