

## Representation

### Draft Modification Report

#### 0507 – Changing The Effective Date of 0451AV (Individual Settlements For Pre-Payment & Smart Meters)

**Consultation close out date:** 08 September 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Wales & West Utilities Ltd.  
**Representative:** Richard Pomroy  
**Date of Representation:** 26 August 2014

#### Do you support or oppose implementation?

Oppose

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

The workgroup report didn't contain persuasive reasons for implementation.

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

No new issues.

#### Relevant Objectives:

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

It would have detrimental effect on objective F) Promotion of efficiency in the implementation and administration of the Code.

#### 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

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**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.*