

**Representation - Draft Modification Report 0516S**  
**Information provision by large**  
**Customers to aid understanding of site characteristics**

**Responses invited by: 24 April 2015**

<b>Representative:</b>	Richard Pomroy
<b>Organisation:</b>	Wales & West Utilities Ltd.
<b>Date of Representation:</b>	23 April 2015
<b>Support or oppose implementation?</b>	Oppose
<b>Relevant Objective:</b>	<p>a) Efficient and economic operation of the pipe-line system. <b>None</b></p> <p>b) Coordinated, efficient and economic operation of            (i) the combined pipe-line system, and/ or            (ii) the pipe-line system of one or more other relevant gas transporters. <b>None</b></p> <p>f) Promotion of efficiency in the implementation and administration of the Code. <b>Negative</b></p>

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

This modification has a worthy aim of improved communication between large sites and transporters; however we do not believe that it will improve the load shedding process in practice. If load shedding is required then, depending on the nature of the emergency, there may be little choice in which sites have to shed load. When load shedding we will start with the largest loads on the relevant part of the network and work down. Regardless of whether a site has submitted information they will still be rung up and a discussion had about the circumstances pertaining on that particular day. This means that the information submitted and held under this proposal is, in practice, likely to be of little value. We also have doubts that the information will be kept up to date during a year. In addition we do not think that it is good practice to have a provision in code which is in effect voluntarily for both parties and therefore think that this is detrimental to the efficient administration of the code.

**Self-Governance Statement: Please provide your views on the self-governance statement.**

We agree that this is a self-governance modification.

**Implementation: What lead-time do you wish to see prior to implementation and why?**

If implemented we agree that it should be implemented to come into effect at Project Nexus go live.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

We would incur some costs to set up and maintain the information which we do not think would add value to the load shedding process

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

**Please provide below any additional analysis or information to support your representation**