

## Representation - Draft Modification Report 0589S

### Inclusion of CSEP Meter Supply Points within NDM Sampling Arrangements

Responses invited by: **5pm on 09 September 2016**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Richard Pomroy
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	9 <sup>th</sup> September 2016
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>d) i</b> Positive <b>f)</b> None

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

This modification will potentially increase the sample size for the production of profiles for settlement classes 3 and 4 through the inclusion of CSEP meter points in the population. This should make the profiles more accurate thereby facilitating effective competition between Shippers.

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

We agree that this modification should be self-governance

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

This modification should be implemented on Project Nexus Implementation Date, it cannot be implemented before Mod 440. We think that the reference to “soon after” in the modification report is subject to interpretation and that a more precise term should have been used for example “no more than three months after”.

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

WWU would not incur any costs.

**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.*

No

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

N/A