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26 April 2011

Dear Dora,

Re: Open Letter Consultation on Code Modification Urgency Criteria – 30/11

Wales & West Utilities Limited (WWU) is a licensed Gas Distribution Network (GDN) providing Gas Transportation services for all major Shippers in the UK. We cover 1/6th of the UK land mass and deliver to over 2.4 million supply points. WWU is one of only two Licence Operators that focus solely on Gas Distribution in the UK.

We welcome the opportunity to comment on this Open Letter Consultation which has asked us to consider if the criteria defined in Appendix 1 is suitable for determining whether a code modification proposal should be treated as urgent. WWU are supportive of the criteria Ofgem has suggested and find that they are largely similar to those already being used for UNC modification proposals.

However, we do not believe that the current criteria addresses the situation where a modification proposal is granted urgent status because it is linked to a time/date related event that could have been avoided if the proposer had acted in an appropriate and timely manner. For example, the time/date related event may have been known about well in advance but becomes an 'imminent' date due to a proposal being raised late on in the process. WWU proposes that Ofgem considers how this issue can be addressed as part of its consultation.

If you require any further information regarding this response, please contact me (simon.trivella@wwutilities.co.uk) on 02920 278550.

Yours sincerely,



for

Simon Trivella
Regulation and Commercial Manager

24 hour gas escape number
Rhif 24 awr os bydd nwy yn gollwng

0800 111 999*

*calls will be recorded and may be monitored
caiff galwadau eu recordio a gellir eu monitro