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1st May 2015

Statutory Consultation on Proposed Modifications to the Standard Special Condition A40 (Regulatory Instructions and Guidance) ("SSC A40") of the Gas Transporter Licence

Dear Mick,

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 transport gas to over 2.4 million supply points.

We welcome the opportunity to respond to this consultation on the proposed modifications to the gas transporter licence. For the avoidance of doubt, this response can be published in full.

We have comments on the following tables:-

Table 3.8

This table will be completed on best endeavors basis for the lower 47 asset categories due to the fact the outputs definitions and how these will impact the finance reporting has not yet been addressed through the costs and outputs working group. Some GDNs will have issues with systems and detailed reporting for the 2014/15 and 2015/16 year and therefore, as a sector we will possibly have consistency issues.

Table 4.4

There is a new section added in columns J – N which looks like it relates to connections but table 4.4 is a reinforcement tab. We believe this should be removed.

Table 3.13

The GDNs collectively worked on an alternative table 3.13 which better reflects the annual costs of Streetworks at a level consistent and meaningful for all GDNs. The current table 3.13 is reflective of information required for a reopener, but not for annual reporting and inconsistencies can occur as some of this information is not currently collected by GDNs who are not experiencing all new changes in legislation.

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Tables 6.7 & 6.8

As we have not discussed definitions or agreed RIG's definitions for either of these tables, when we submit as a supplementary to the RRP, please be aware it will be on a best endeavors basis and there is a possibility of inconsistent completion of the tables between the GDNs.

Yours sincerely,



Steve Edwards
Head of Regulation
Wales & West Utilities

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