

Rebecca Pickett,
Code Governance Remedies
Ofgem
9 Millbank
London
SW1P 3GE
Rebecca.Pickett@ofgem.gov.uk

Wales & West House
Spooner Close
Celtic Springs
Coedkernew
Newport NP10 8FZ

Tŷ Wales & West
Spooner Close
Celtic Springs
Coedcernyw
Casnewydd NP10 8FZ

Telephone/Ffôn: **0800 912 29 99**
Fax/Ffacs: **0870 1450076**
Email/Ebost: enquiries@wwutilities.co.uk
www.wwutilities.co.uk

24th March 2017

WWU response to consultation on Proposed direction pursuant to Special Condition 4C of the distribution licences

Dear Rebecca,

Wales & West Utilities (WWU) transports gas to 2.5M supply points in Wales and south west England.

Thank you for the opportunity to respond to the proposed direction, our response to the two questions are below.

Question 1: Under the new FGO arrangements are there any other services apart from must reads in relation to the CDSP for which GTs get paid by another party and as such should be treated as an Excluded Service?

We believe that only must reads needs to be defined as and Excluded Service.

Question 2. Do you consider that the draft direction at Annex 1 delivers on the policy intent described in this letter and do you have any comments on the draft direction?

The purpose of the direction is to define revenue such as must read revenue as excluded from the Transportation Allowed Revenue, therefore we suggest that the wording "treated as" is unnecessary. Other than this point we agree that Annex 1 delivers the policy intent.

Yours sincerely,



Steve Edwards
Director of Regulation and Commercial
Wales & West Utilities

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