

Mr Steve Brown
Ofgem
9 Millbank
London
SW1P 3GE
steve.brown@ofgem.gov.uk

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

Tŷ Wales & West
Spoooner 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

4th January 2017

Re: Open letter: Consultation on relaxing the accuracy requirements of Calorific Value Determining Devices

Dear Steve,

Wales & West Utilities 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 2.5 million supply points. We are at the forefront of connecting renewable gases to our gas network and we now have 16 biomethane connections which provide enough energy to keep over 100,000 families safe and warm.

WWU supports Ofgem's minded-to decision to relax the current Ofgem-approved Calorific Value Determination Device (CVDD) parameters to an accuracy equivalent to Class 2 performance under ISO 15971:2008 and Class A performance under OIML R 140:2007, specifically to 0.2MJ/m³.

We agree with Ofgem's view that the change would not have a detrimental impact on customers. Further to this we see the relaxation of the CVDD parameters as having the potential to promote further carbon reductions on the gas network by allowing new, cost efficient, CVDDs to enter the market and thus lowering one of the potential barriers to entry for prospective biomethane and green gas producers.

Simultaneously, the use of some new CVDDs such as the Gas PT2 on biomethane and other distributed gas connections may have the potential to provide additional benefits through their higher sampling rate – potentially allowing for more efficient management of gas quality and maximising opportunities for green gas injection.

Yours sincerely,



Steve Edwards
Director of Regulation and Commercial
Wales & West Utilities

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