

UNC Mod Panel Secretary
Joint Office of Gas Transporters
31 Homer Road
Solihull
West Midlands
B91 3LT

06 May 2010

Dear John,

Re: **UNC Modification Proposals 0286 and 0286A – Extending Modification Panel Voting Rights to a Consumer Representative**

Thank you for the opportunity to respond to these Modification Proposals. Northern Gas Networks (NGN) would like to offer qualified support for both these modification proposals.

Both of these modification proposals seek to extend the current rights of the Consumer Representatives who sit on the Modification Panel to include voting rights to varying extents. NGN has welcomed the increased attendance and contribution at the Modification Panel and other industry meeting from Consumer Representatives over recent months, and acknowledges that the extension of this into becoming a voting party is aligned in principle to Ofgem's Final Proposals from the Code Governance Review.

NGN is, however, conscious that these modification proposals were raised and issued for consultation prior to the publication of the Final Proposals and believes that this premature action has caused neither proposal to be fully consistent with the Final Proposals. We further note that Ofgem have stated that further modification proposals may be required to ensure that UNC is fully consistent with the Final Proposals.

It is as a result of the obvious requirement for further work in this area to fully reflect the ability of the Authority to also appoint a further Consumer Representative that NGN feels only able to offer qualified support at this time.

NGN believes that further development through the Governance Workstream on the wider implications of the Final Proposals will help to ensure that future modifications are more likely to be fully consistent with the Final Proposals.

I hope these comments will be of assistance. Please contact me should you require any further information in respect of this response.

Yours sincerely,



Joanna Ferguson
Network Code Manager