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Your Reference: Modification Proposal 0279.

Re: Modification Proposal 0279 'Improving the availability of meter read history and asset information'

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal. National Grid Gas plc (Distribution) ('NGD') supports the implementation of the proposed Modification of the UNC.

We note that the Modification Proposal aims to permit Meter Reading history and relevant Meter Information to be released to Users for Supply Points restricted to their current Supply Point portfolio.

The Modification Proposal specifically seeks to:

- a) Give permission for the relevant Transporter to release the information; and
- b) Require a report to be available on request to each User as a User Pays Service.

We concur with the proposer that the measures identified would assist the Registered User in being able to validate the proposed AQ provided by the Transporters agent, xoserve in the Annual AQ Review. We also agree that the availability to Incoming Users of Meter Reading history and Meter Information provides a 'level playing field' concerning data transparency and would enable a more thorough AQ review process to occur than is currently the case. We do not believe that the proposal gives rise to a risk of inappropriate behaviour as identified in Section 11 under 'disadvantages'.

NGD therefore believe that the Proposal as drafted facilitates Standard Special Condition A11.1 (d): so far as is consistent with subparagraphs

(a) to (c) the securing of effective competition:

- (i) between relevant shippers;
- (ii) between relevant suppliers;

NGD concurs with the proposed cost recovery mechanisms as set out in Section 2 'User pays' of the Draft Modification Report. We also note that ROM costs have been provided in respect of this Proposal.

We trust that this information will assist in the compilation of the Final Modification Report.

Please contact me on 01926 653541 (chris.warner@uk.ngrid.com) should you require any further information.

Yours sincerely,

Chris Warner
Network Code Manager, Distribution.