

Bob Fletcher
Joint Office of Gas Transporters
31 Homer Road
Solihull
B91 3LT

Chris Warner
Network Code Manager, Distribution
chris.warner@uk.ngrid.com
Direct tel +44 (0)1926 65 3541

www.nationalgrid.com

25th February 2011
Your Reference:UNC Modification Proposal 0314.

Re: UNC Modification Proposal 0314:
'The provision of a "Data Update" to Non Code Parties'

Dear Bob,

Thank for your invitation seeking representations with respect to the above Modification Proposal.

Do you support or oppose implementation?

Support/Qualified Support/Neutral/Not in Support/Comments* *delete as appropriate*

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

For the purposes of this representation, National Grid Distribution (NGD) has provided comments only. The Proposal is confined to enabling the release of Protected Information for the purposes of populating an AMR 'data hub' to be operated by ESTA Management Services Limited.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

We have not identified any such issues.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Standard Special Condition A11.1 (d): We agree that in principle the release of data to ESTA as identified within the Modification Proposal could facilitate the reduction of costs associated with the change of supplier process where AMR is installed on Industrial & Commercial (I&C) sites, by ensuring the incoming supplier has visibility of the equipment and commercial arrangements on site. We also accept that this could in principle allow improvements in the efficiency of the process for managing the installation of AMR equipment on I&C sites.

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

To the extent that this Modification Proposal is confined to enabling the release of relevant Protected Information and is for no other purpose, no such costs would be incurred.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

This Modification Proposal could be implemented immediately upon direction from the authority.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

NGD has provided suggested legal text with respect to this Modification Proposal. It is likely that this will reflect the finalised drafting although minor changes may be made.

Is there anything further you wish to be taken into account?

NGD notes that this Modification Proposal is limited to enabling the release of Protected Information for the purposes of UNC TPD Section V5. Notwithstanding this, the Proposal states "It is envisaged that, following implementation of this Proposal, ESTA would enter into a separate arrangement with the Transporters to acquire this data and to receive periodic updates. This would be subject to ESTA entering into a confidentiality agreement with the Transporter which prohibited use or disclosure of the relevant Protected Information in terms no less onerous than those contained with UNC TPD Section V5". We would draw particular attention to the importance of the need for a confidentiality agreement in such circumstances.

Given the scope of this Modification Proposal we have chosen not to comment on any issues which may arise which can be associated with a separate agreement between ESTA and the Transporters for the release of relevant data. We also believe it would be inappropriate at this stage to express a view on any systems/process complexities or costs associated with making such data available to ESTA.

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.