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02<sup>nd</sup> March 2011

Your Reference:UNC Modification Proposal 0353.

**Re: UNC Modification Proposal 0353:**  
**'Population and Maintenance of the Market Sector Code within the Supply Point Register'**

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.

National Grid Distribution (NGD) believes that this Modification Proposal identifies a pragmatic solution to ensuring the timely population of Market Sector Codes on the Supply Point Register. Given that it is quite possible that future developments being considered within the remit of Project Nexus may require a greater use of separation of categories of Supply Points by market sector it is prudent that measures should be taken to ensure the accuracy and completeness of this data item. We also concur with the views of the Proposer that "The terms 'domestic' and 'non-domestic' feature in the Supplier, Shipper and Transporter licences as well as numerous pieces of primary and secondary legislation. In order for data within the Supply Point Register to be used for any purpose connected to these articles the population and accuracy of the MSC is essential".

## 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?*

We agree with the Proposer's opinion that the Proposal facilitates the relevant objectives as set out within Standard Special Condition A11.1 (a),(b)(ii),(c),(d)(i)&(ii) and (f).

## **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 subject to User Pays arrangements we agree with the proposer's view of the allocation of such charges.

## **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. However, we are aware that a system solution may be required following the conclusion of the transitional period if there are a significant number of blank MSC values remaining. We also note that the complexity of the solution and therefore the extent of implementation costs will be contingent on User performance on populating missing MSCs during the transitional period.

## **Legal Text:**

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

NGD has viewed the suggested legal text with respect to this Modification Proposal and has provided comments to the Proposer with respect to this. We are satisfied that the amended draft legal text as published by the Joint Office meets the requirements of the Modification Proposal.

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

NGD has not identified any such matters.

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.