

Bob Fletcher
Joint Office of Gas Transporters
Consort House
Princes Gate Buildings
6 Homer Road
Solihull
B91 3QQ

8 January 2014

Dear Bob,

Re: UNC Modification Proposal 0451V/AV – Individual Settlement for Pre-payment & Smart Meters

Thank you for the opportunity to provide representation of the above noted Modification Proposals. Northern Gas Networks (NGN) would like to provide comments in respect of these Modification Proposals.

NGN is concerned that these Modification Proposals have been developed in a rushed manner and without proper consideration for the overall need and demand for the service or the cost/benefits of making temporary changes to the existing regime. The development of these Modifications, particularly in the latter stages, has been heavily driven by the ability to produce legal text rather than setting out clear objectives with obligations and rights being clearly defined and described within the proposal. This has resulted in numerous iterations of legal text being required, none of which would be considered complete due to the incomplete nature of the proposals. The final version of the legal text produced for this consultation included new business rules that had not been discussed during the original assessment which we believe shows that the accelerated nature of assessment did not allow sufficient time to ensure that the proposals were complete and robust.

We have further concerns regarding possible implementation of these Modifications that would result in costly and complex changes and would require considerable ongoing activity to maintain. These changes would only have effect from the time of implementation until such time as the UK Link Replacement/Project Nexus changes were implemented making them short lived. Furthermore they will need to utilise resources within Xoserve that could be better used elsewhere in the considerably congested current change timetable, much of which is driven by the EU or DECC changes.

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

Yours sincerely,



Joanna Ferguson
Network Code Manager