

Joint Office

[Enquiries@gasgovernance.co.uk](mailto:Enquiries@gasgovernance.co.uk)

25 October 2019

Dear Sir or Madam,

**Re: 0703S Correction to Modification 0698S 'Improvements to Margins Notice Arrangements'**

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

**NGN supports this Modification Proposal.**

**Reason for support/opposition:**

Please summarise (in one paragraph) the key reason(s)

We support this proposal and believe it should further Relevant Objectives a) *Efficient and economic operation of the pipe-line system* and b) *Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/or (ii) the pipe-line system of one or more other relevant gas transporters* as correction of the calculation term "reduced" to "increased" in Transportation Principle Document (TPD) Section 5.9.9 (a)(ii) should ensure accurate usable stock calculations are performed at LNG Importation Facilities for the Gas Flow Day.

**Self-Governance Statement:**

Please provide your views on the self-governance statement.

This proposal should follow Self-Governance procedures as it is only looking to correct a term inconsistency within the original 0698S, Improvements to Margins Notice Arrangements, Solution and legal text. Neither this modification proposal, nor the original 0698S, appear to meet the criteria for requiring Authority decision.

**Implementation:**

What lead-time do you wish to see prior to implementation and why?

This proposal could be implemented 16 Business Days after receiving UNC Modification Panel approval, subject to there being no appeals.

**Impacts and Costs:**

What analysis, development and ongoing costs would you face?

We have identified no analysis, development or ongoing costs to NGN as a result of this proposal.

**Legal Text:**

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

We believe that the legal text provided should deliver the Solution set out in the proposal.

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Call the National Gas Emergency  
Service on 0800 111 999



1100 Century Way  
Thorpe Park Business Park  
Colton, Leeds LS15 8TU



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**Are there any errors or omissions in this Modification Report that you think should be taken into account?**

Include details of any impacts/costs to your organisation that are directly related to this.

None identified.

**Please provide below any additional analysis or information to support your representation.**

None.


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,

Tracey Saunders (via email)  
Market Services Manager (Industry Codes)  
Mobile: 07580 215 743

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