

Joint Office

Enquiries@gasgovernance.co.uk

06 May 2020

Dear Sir or Madam,

Re: 0704S Transporter Theft of Gas Reporting

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 as amendments to the Transporter Theft of Gas reporting arrangements to remove duplication of the reporting of items across codes, and update the reporting measures, as well as aligning the reporting cycle, should provide clarity and improve accessibility of data and limiting the reported data to that which is still considered of value to industry, thus furthering Relevant Objectives c) *efficient discharge of the licensee's obligations* and f) *promotion of efficiency in the implementation and administration of the Code*.

Self-Governance Statement:

Please provide your views on the self-governance statement.

This proposal should follow self-governance procedures as it is only seeking to amend existing Theft of Gas reporting requirements and does not propose any changes to party systems or processes or have any end customer impacts.

Implementation:

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

This proposal could be implemented sixteen business days after UNC Panel approval, subject to no appeal being received.

Impacts and Costs:

What analysis, development and ongoing costs would you face?

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

Legal Text:

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

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

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Service on 0800 111 999



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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.

We believe that an SLA will need to be agreed for the submission of the updated monthly information to the Central Data Services Provider (CDSP) as the previous arrangement of D+4 will no longer be sufficient time to produce and submit the relevant data.

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

We understand that this modification completes the findings from the joint UNC and SPAA workgroup (UNC 0677R) and is raised to compliment changes already made to SPAA (under change SPC480).

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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