



Joint Office of Gas Transporters
enquiries@gasgovernance.co.uk

31 October 2017

Dear Joint Office,

Re: UNC Modification Proposal 0625 - Extension of 4 months to 10 months to transfer non-mandatory sites from Class 1

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

NGN does not support this Modification proposal.

Reasons for Support/Opposition:

NGN does not support this modification as we feel sufficient time has been provided to allow for planning of, and undertaking of the transition of voluntary sites from Class 1 to the appropriate Class of 2, 3 or 4; particularly with the original extension of the Daily Metered Service provided by Transporters of Nexus go-live plus 6 months which was approved by Ofgem in February 2015. Shippers indicated in their consultation responses for the original extension modification (0514) that there would be no additional system development or costs associated with the extension that were outside of their already planned Project Nexus costs, as well as confirming support for the proposed timescales. Transporters also highlighted in their responses that they expected prompt action from Shippers regarding the transition and that it should not be left to Transporters to transfer a large volume of sites to Class 4 at the end of the transitional period.

Self-Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

NGN has not changed our position on self governance and voted in favour of this being self governance at the August UNC Modification Panel.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?



We do not feel that approval of this modification would further Relevant Objective f) Promotion of efficiency in the implementation and administration of the code as prudent and reasonable planning in the transition to Project Nexus go-live provided sufficient time for the 6 month transition arrangements to be adequately provided for.

Impact and costs:

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

We feel that if this modification were to be approved, it would require Transporters to continue to offer a Daily Metered Service and the associated equipment for sites which do not meet the Class 1 mandatory read criteria instead of these sites moving to meter read provisions that have been competitively procured by shippers.

Implementation:

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

If this modification were approved, we would prefer that it be implemented as soon as reasonably practicable to reduce any further delay in the transitional period.

Legal Text:

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

We agree that the legal text provided supports the solution specified in the modification.

Errors or Omissions in the Modification Report:

None.

Any additional comments:

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,



Shanna Key
Industry Codes Officer