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## **Response to Leakage Model Modification Consultation No. 3 (Scotia Gas Networks)**

Dear Stuart,

Thank you for the opportunity to respond to the Leakage Model Modification Consultation No. 03. This response is on behalf of National Grid Gas Distribution.

1. National Grid supports your proposal to establish an estimate of current service populations by utilising recorded mains and service replacement data. The current low pressure service leakage estimate is based on an estimation of national service populations dating back to the early 1990s. Adoption of the proposed methodology would provide a more accurate assessment of current leakage from low pressure services that is based on regionally aligned data.
2. National Grid supports the amendment to the leakage model to take account of the impact of service transfer activity. The inclusion of this element would provide for a more accurate assessment of leakage from low pressure services going forward.
3. National Grid supports your proposal to amend the Environmental Emissions baselines.
4. National Grid supports your recommendation for implementation of the proposed modifications with immediate effect, i.e. for the leakage and shrinkage assessments in respect of 2011/12.
5. The proposed modifications to the leakage model have been discussed at a Shrinkage Forum, held 6 January 2012, at which they were considered reasonable. In addition, National Grid has consulted on the adoption of the same methodologies and this view was supported by the appointed independent expert.

I am happy to discuss any of the points raised above should you require any further clarification.

Yours sincerely

Roy Malin