

Mr. Julian Majdanski
Joint Office of Gas Transporters
Ground Floor Red
Homer Road
Solihull
B91 3QJ

Declan McLaughlin
Manager – Customer Service
declan.mclaughlin@uk.ngrid.com

Direct tel +44 (0) 1926 656914
Direct fax +44 (0) 1926 656620

www.nationalgrid.com

19 May 2006

Dear Julian

UNC Modification Proposal 0082: 'Clarificatory Revisions to UNC Section Q - Emergencies'

Thank you for your invitation seeking representations with respect to the above Modification Proposal.

National Grid Gas plc (UK Distribution), ("Distribution"), is of the opinion that this modification should be implemented.

We believe that the amendments to the UNC are required to align the UNC with the NEC's Safety Case and the associated Emergency Procedures following the introduction of the new definitions for types of emergency and to reflect other modifications to the UNC over the past 12 months.

However, we believe there are number of minor improvements that could be made to the report and to the legal text:

- a) Report: Page 4, (Paragraph IV), makes a reference to section Q3.1.8. There is no section Q3.1.8 in the legal text.
- b) Text: Section Q1.2.3 makes several references to "Transportation Constraint". Comprehension of the section would be improved if the definition of Transportation Constraint was included in Section Q or at least a reference to the section in UNC General Terms where the definition can be found.
- c) Text: Section Q1.2.3b(ii) et seq, are prefaced by "or". The UNC drafting style is to place conjunctives at the end of each sub-section.
- d) Text: Section Q1.2.3b(iii). Why is this eventuality classified as a Gas Deficit Emergency?

We believe implementation would be consistent with National Grid's licence obligation to operate the combined pipe-line system in a coordinated, efficient and economic manner by ensuring that the contractual framework is clear and consistent with transporters' statutory and regulatory obligations. Accordingly, Distribution agree with the proposer's view that implementation would be consistent with requirements of Standard Special Condition A11.1(a) of their gas transporter's licence.

Yours sincerely,

Declan McLaughlin