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Dear Julian

Re : UNC Modifications 0139 & 0139A – Amendments to UNC TPD OCS Process and Long Term Allocation of Capacity in the Transitional Period

Thank you for the opportunity to comment on the above Modification Proposals. National Grid NTS is supportive of Modification Proposal 0139 and neutral in respect of Modification Proposal 0139A.

Modification Proposal 0139

National Grid NTS has considered the merits contained within the Modification Proposal raised by Scotia Gas Networks. We note that the Proposer has brought forward amended legal text 6.3.6 (e) which reflects National Grid NTS concerns relating to our ability to reject an application made by a DN User, which would subsequently result in a breach of the Safety Monitor. The amended legal text satisfy these concerns.

We would point out that the legal text having been amended to cater for the above point does not reflect the original modification in this area. We would also point out minor formatting errors within 6.3.3 of the legal text which would require amending prior to final inclusion, if the Modification Proposal were to be implemented. Other than raising awareness of these two points, National Grid NTS supports the implementation of this Modification Proposal.

Modification Proposal 0139A

National Grid NTS has considered the merits of this Modification Proposal Alternative which relates to the publication of the OCS process in terms of NTS-LDZ Offtake Capacity and Assured Pressures.

Whilst we support Modification Proposal 0139 as raised by SGN, National Grid NTS remains neutral to the alternative Modification Proposal 0139A.

Currently the information is confidential between National Grid NTS and the relevant Distribution Network; such Users may raise concerns as part of this consultation process on this point. We would

consider that the alternative Proposal would have benefited from industry discussions within an appropriate Workstream prior to being sent to consultation to understand impacts or not, to Network Users of this Proposal.

Given the timescales involved if Modification Proposal 0139A were to be implemented, National Grid NTS could not implement on the Gemini System, but would be able to publish the information on the National Grid web site after the completion of the OCS process.

Please contact me if you require any further information on this matter.

Yours sincerely,

Martin Watson
Transmission Gas Charging and Access Development Manager