

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

Mark Freeman
Contract Manager
Mark.freeman@uk.ngrid.com

Direct tel +44 (0) 1926 656218
Direct fax +44 (0) 1926 656620

www.nationalgrid.com

3 May 2007

Dear Julian

Re: Modification Proposal 0142: "Extension of Current Sunset Clauses for Registration of Capacity at NTS Exit Points"

Thank you for your invitation seeking representations with respect to the above Modification Proposal. These comments are on behalf of National Grid Gas plc (UK Distribution) ("Distribution").

Distribution supports the implementation of Modification Proposal 0142 in line with the suggested implementation date of 1 June 2007. This is necessary to enable DNs to book NTS Offtake Capacity (in June/July 2007) beyond September 2010 and comply with their regulatory and safety obligations.

The reasons for this are that the relevant provisions in the UNC were written on an interim basis pending the introduction of an enduring regime that was originally anticipated to be by 1 October 2008 and subsequently 1 October 2010. Consequently, following the delay to the enduring regime, there exists no mechanism to enable capacity registration for the period beyond October 2010. It is therefore proposed in this modification that transitional provisions for capacity registration be extended to Gas Year 2010/2011.

It is noted that the appeal pending against the implementation of Mod 0116V which introduces the enduring arrangements for NTS Exit Capacity Reform will not affect this proposal but were the appeal to be successful then this proposal would subsequently be subsumed by proposal 0116A.

The proposal demonstrably better facilitates the relevant objectives as stated below.

Extent to which implementation of the proposed modification would better facilitate the relevant objectives

Gas Transporter Licence Standard Special Condition A11.1

(a) *the efficient and economic operation of the pipe-line system to which this licence relates;*

the implementation of the Proposal would enable DNO Users to register their NTS/LDZ Offtake Capacity requirements beyond September 2010, which would allow DNO Users and National Grid NTS ("NTS") to undertake better informed investment decisions in their own

networks and thereby better facilitate the efficient and economic operation of their pipeline system; and

- (b) so far as is consistent with sub-paragraph (a), the coordinated, efficient and economical operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters;**

the implementation of the Proposal would enable NTS and DNO Users to formally confirm NTS/LDZ Offtake Capacity levels to support their respective investment decisions beyond September 2010 and thereby better facilitate the co-ordinated, efficient and economic operation of the combined pipe-line system; and

- (c) so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence;**

the implementation of the Proposal would also promote the economic and efficient discharge of the DNO Users Licence obligations by promoting economic and efficient development and operation of the system.

I hope you find these comments helpful.

Yours sincerely,

Mark Freeman