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Your Reference [Mod 0165V]

Re: Modification Proposal 0165V: 'Change to the Measurement Provisions Change Process'

Dear Julian,

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

National Grid Gas Distribution plc (NGD) would like to offer support for this proposal.

Currently where amendment to the measurement provisions is required at an NTS System Entry or Exit point this can only be done with the written permission of all Users at the System Point or by a UNC Modification Proposal.

It is highly probable that an increasing number of these changes will be required and given that they are usually non contentious, it would seem unnecessary to burden the industry with pursuing the Modification route.

This proposal will allow the permitted ranges within the Measurement Provisions of a NEA or NExA to be increased without the need for a Uniform Network Code Modification Proposal. Relevant Users would be informed and given the opportunity to object. Should any objections be received the change would be progressed as a UNC modification. This should help to relieve any administrative burden and associated costs for the industry. The legal text provided with the proposal sets out that the Transporter will notify Users and 'interested parties' have five business days to respond which is appropriate.

The intent of this proposal is consistent with the facilitation of A11.1 (f)the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code. There is also merit in ensuring that these amendments can be made quickly to prevent any unnecessary constraint on gas entering the system.

Yours sincerely

Phil Lawton
Distribution Regulation Manager