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Your Reference 0184

Re: Modification Proposals 0172 'Transporter Obligations Pertaining to Void and Vacant Sites'

Dear Julian,

Thank you for your invitation seeking representations with respect to the above Modification Proposal. National Grid Distribution supports its implementation.

We recognise that the timely provision of information to Users regarding disconnections at properties which are proposed to be demolished assists Users in mitigating exposure to Transportation charges as a consequence of ongoing Supply Point Registration.

Nevertheless, we would like to stress that Supply Point Registration is a matter for the User and is informed by the relationship with its customer via the Contract of Supply. The UNC clearly specifies mechanisms for the commencement and cessation of Supply Point Registration and therefore the ability to mitigate financial exposure is entirely within the control of the User. Therefore the proposed communication should only be viewed as a secondary source of information which complements the primary source outlined above.

In respect of the suggested legal text associated with the proposal, we believe that this should reflect that the relevant Transporter will issue the notice to the User following a disconnection at a premise for which, additionally, a demolition notice has been received by the relevant Transporter in respect of the relevant building/s pursuant to section 81 of the Building Act 1984. As drafted, the text intimates that it is the Building Act notification that initiates the disconnection which is not the case.

In respect of implementation costs, National Grid would be required to implement additional operational processes to ensure that the required notices are issued within the required timescale to ensure compliance with the new provisions. As such, National Grid would be unable to facilitate immediate implementation should the appropriate direction be given by the Authority. We are currently undertaking analysis to determine the timescales for implementation.

We trust these comments are useful for compilation of the Final Modification Report.

Please contact Chris Warner on 01926 653541 (chris.warner@uk.ngrid.com) should you require any further information with respect to the above.

Yours sincerely

Phil Lawton
Distribution Regulation Manager