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**Re: Modification Proposal 0182: 'Information provision at LNG Importation Facilities'.**

Dear Julian,

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

National Grid Gas (Distribution), ("NGD"), hold the view that implementation of Modification Proposal 0104: '*Storage Information at LNG Importation Facilities*', created the potential for National Grid Transmission (NTS) to be in breach of its obligations under the Uniform Network Code should it fail to publish the aggregate physical stock levels across all LNG Importation Facilities at the end of the Gas Day. NGD highlighted its concerns in relation to the ability of NTS to be able to provide such information, within its representation to that Proposal. Given that this concern has not been addressed previously, NGD supports this new Modification Proposal which ensures that NTS is not compelled to provide information that is not in its possession.

NGD supports the view of the Proposer that implementation of this Modification Proposal would better facilitate SSC A11.1(f) in facilitating the promotion of efficiency in the implementation and administration of the uniform network code.

UKD maintains the view expressed in relation to 0104 that requirements in relation to disclosure of this information could affect the willingness of potential OM storage providers to offer their services to NTS which conflicts with the obligation placed upon NTS to increase contestability in the provision of Operation Margins.

Yours sincerely

Phil Lawton  
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