

Julian Majdanski  
**Joint Office of Gas Transporters**  
51 Homer Road  
Solihull  
B91 3QJ

Phil Lawton  
Distribution Regulation Manager  
Phil.lawton@uk.ngrid.com  
Direct tel +44 (0)1926 656448  
Direct fax +44 (0)1926 656602

[www.nationalgrid.com](http://www.nationalgrid.com)

14 January 2008  
Your Reference 0184

**Re: Modification Proposals 0184 'Requirement for Partial Non-Business Days for the Purposes of the UK Link Technology Refresh (UKLTR) Project'**

Dear Julian,

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

The updating of the UK Link infrastructure will facilitate the ongoing reliability and functionality of the UK Link suite of systems. To facilitate this activity, we agree that it is necessary to amend, on a transitional basis, the UNC terms identified as Transporters will not have the operational capability (as a consequence of the implementation of the technology refresh) to perform the relevant transactions.

Notwithstanding our support for the principles of the proposal, we wish to make the following comments in respect of the draft legal text associated with the proposal as we do not believe that it accurately reflects the nature of the proposal. Additionally we believe efficiencies may be made in the quantity of drafting required.

The Nature of Proposal states a requirement for 25 and 26 February 2008 to be treated as non business days in respect of UNC process within section G, M and S4. Elsewhere within the proposal it clarifies that non-business days are distinct from non-effective days whereby Supply Point confirmations may become live on such a day in the case of the former but not the latter. This feature of the requested non-business days is further clarified in section 5 and the appendix of the proposal

The proposed non business days are contradicted somewhat by the draft legal text sections 3.2(a) and (b) which appear to be features of a non-effective day. These two sub-paragraphs would therefore appear to be superfluous and should only apply if the proposer is requesting non-effective days.

Additionally section 3.1 seeks to explain the reasoning for the change whereas we would argue that this is not the role of the legal text and further, the wording "For the avoidance of doubt" within para 3.3 would not appear to be necessary.

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](mailto:chris.warner@uk.ngrid.com)) should you require any further information with respect to the above.

Yours sincerely

Phil Lawton  
Distribution Regulation Manager