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Re: Modification Proposal 0185VV 'Measurement Error Notification Process'

Dear Julian,

Thank you for your invitation seeking representations with respect to the above Modification Proposal. National Grid Gas (Distribution), ("NGD") would like to offer full support for implementation of this Modification Proposal. The concerns that were highlighted by NGD and other parties in relation to Modification Proposals 0185 and 0185A have now been satisfactorily resolved.

NGD actively participated in Review Group 0131 "LDZ RbD Reconciliation Notification Process" and agreed with its conclusions. NGD had always been of the opinion that the "guidelines" (Measurement Error Notification Guidelines For NTS To LDZ And LDZ To LDZ Measurement Installations), which were developed following the closure of the Review Group, would form an integral part of any Proposal to allow the parties wishing to provide representations to the modification to have a full picture of the changes being proposed. NGD welcomes the inclusion of the agreed version of these guidelines within this Proposal.

NGD believes that the formation and adoption of the agreed guidelines would better facilitates SSC A11.1 (d) ... the securing of effective competition between relevant shippers ...by serving to improve contractual transparency and thus reducing contractual risk.

NGD supports the desire of Users to reference the guidelines as part of UNC section V12 to allow "light touch" governance which was a recommendation of the review group. In this respect the Proposal is consistent with SSC A11.1 (f)... promotion of efficiency in the implementation and administration of the ... uniform network code.

The changes proposed to the Offtake Arrangements Document are appropriate and will help to ensure consistency with the guidelines.

Should this Proposal be approved for implementation, NGD believes that a period of several months may be required to introduce the procedures and to nominate and confirm the appropriate list of experts. In any event NGD would confirm that should this Proposal be implemented it would endeavor to work in line with the guidelines from the outset.

Please contact Alison Chamberlain on 01926 653994 (alison.chamberlain@uk.ngrid.com) should you require any further information with respect to the above.

Yours sincerely

Phil Lawton

Distribution Regulation Manager