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Our Ref: AHT/Mod 0191 response

Dear Julian

## **Representation to Modification Proposal 0191: Discontinuance of Code Credit Rules**

Thank you for the opportunity to respond to this Draft Modification Report (DMR). National Grid Transmission supports Modification Proposal 0191. We note that a Variation Request to this Modification Proposal has been submitted and, having reviewed the request, we agree that it represents an immaterial change.

### **2. Extent to which implementation of the proposed modification would better facilitate the relevant objectives**

#### ***Standard Special Condition A11.1(d) so far as is consistent with sub-paragraphs (a) to (c), the securing of effective competition: (i) between relevant shippers***

National Grid Transmission agrees with the Proposer that removing the potential for divergence of interpretation of UNC within Code Credit Rules would help facilitate the securing of effective competition between relevant shippers, by ensuring there is no inappropriate discrimination between relevant shippers.

#### ***Standard Special Condition A11.1 (f): so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code;***

We also agree that implementation of this Modification Proposal should promote greater efficiency in the administration of the UNC, by removing the potential for divergence of interpretation of UNC within the Code Credit Rules.

## **10. Analysis of any advantages or disadvantages of implementation of the Modification Proposal**

### **Advantages**

We agree with the Proposer's stated advantages.

### **Disadvantages**

National Grid Transmission considers that the sole disadvantage arising from implementation of this Modification Proposal could be that new Users of the UNC, without prior experience of interpreting the Code, may feel the lack of a "user's guide" to help them understand the impact of the transportation credit rules on their business. In this respect, Transporters may see an increase in transportation credit related enquiries as a result of this proposal being implemented, although this could be mitigated by Transporters providing a separate "user's guide" that is not referenced nor has any standing in the UNC but merely serves to provide practical guidance to the uninitiated. It is National Grid Transmission's intention to produce such a guide, should this Modification Proposal be implemented.

## **15. Proposed implementation timetable (including timetable for any necessary information systems changes)**

National Grid Transmission agrees that this proposal could be implemented immediately following the Authority's decision.

Yours sincerely

**Alex Thomason**  
**Senior Commercial Analyst**