

Julian Majdanski
Joint Office of Gas Transporters
31 Homer Road
Solihull
B91 3LT

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

7 February 2008
Your Reference 0193

Re: Modification Proposal 0193 'Removal of Certain "Gas not made available for offtake" Provisions from the UNC'

Dear Julian,

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

We believe that following the introduction of revised Gas (Standards of Performance) Regulations which will be effective from 1 April 2008, it would be inappropriate for the UNC to contain payment obligations that duplicate those that will exist within the Regulations from the implementation date. Removal of such would avoid any potential confusion regarding the appropriate governance route for prospective change and remove the risk of the potential divergence of provisions.

As a consequence of the removal of UNC payments, we believe it is also appropriate to amend the relevant Compensation Group Limit within Section V as proposed.

As indicated within the proposal, we believe this Modification Proposal would facilitate the efficiency in the implementation and administration of the UNC.

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