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Re: Modification Proposal 0207: "Change to Telemetry Requirements in OAD for SOMSA Exit".

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 support for this proposal. We agree with the Proposer that implementation would better facilitate SSCA 11.1 (a) by allowing the efficient and economic replacement of assets (generally in line with the end of their serviceable life) rather than necessitating quicker change which could not realistically be achieved in any case.

Acknowledging the comments put forward by Scotia Gas Networks in its representation to this Proposal and in recognition that any DNO may wish to replace equipment sooner than the suggested legal text allows, NGD believes that it may be appropriate to amend the text to prevent agreement being "unreasonably withheld". This could be covered in section 2.3.5 (c).

If you should you have any queries relating to this representation, please contact Alison Chamberlain on 01926 653994.

Yours sincerely

Phil Lawton
Distribution Regulation Manager