

Mr Julian Majdanski
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Rd
Solihull
B91 3QJ

Adam Sims
Gas Codes Development
Commercial

Direct tel 01926 655292
adam.sims@uk.ngrid.com

www.nationalgrid.com

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UNC Modification Proposal 0207 – “Change to Telemetry Requirements in OAD for SOMSA Exit”

Dear Julian,

Thank you for your invitation seeking representation with respect to the above Modification Proposal. As Proposer, National Grid NTS supports the implementation of this proposal on the basis that it furthers the achievement of the relevant objectives as stated in the proposal.

The purpose of the Modification Proposal is to permit a telemetry replacement programme to be undertaken in an economic and efficient manner. We note that concerns have been raised by respondents in their representations to this Modification Proposal and we seek to address those concerns here.

We agree that the Modification Proposal does not include any new obligations to provide any new information or functionality over the existing arrangements and we consider this is reflected by the lack of requirements to this effect in the legal text. Any requirement for new information or functionality would therefore have to be the subject of a further Modification Proposal or bilateral agreement between affected Transporters.

We do not believe that anything either in the proposal or associated suggested legal text precludes the ability of a DNO to replace equipment prior to the end of its service life and it is not our intention to restrict the operational or commercial discretion of any DNO in this respect. We do not consider the requirement to agree a date between National Grid NTS and the DNO, as outlined in proposed paragraph 2.3.5 (iii) of Section E of the OAD of our suggested legal text, to be entirely inappropriate, as it is listed as one of three options for establishing the end of service life of a piece of equipment. We consider that by providing these three options, including the deferment to the judgement of a Reasonable and Prudent Operator, implementation of the Modification Proposal would allow DNOs to pursue their operational or commercial preference in these matters.

We agree that any equipment to be installed or modified in future would be subject to the provisions of UNC OAD Section B in terms of the period of notice required for any such works. We do not consider

that this requires any amendment to the legal text as the cross references currently in place between the definition of NTS Telemetry Facilities in Section E and the provision relating to the Right to Alter, Replace or Relocate in Section B already provide this link.

We hope that this provides some clarification in terms of the intent of the suggested legal text.

Please let me know if you require any further information to enable preparation of the Final Modification Report.

Yours sincerely,

Adam Sims
Commercial Analyst