

***Email Representation***

13 October 2008

Dear John

**UNC Modification Proposal 0218: Amendment to the base period used to define Seasonal Normal weather.**

Northern Gas Networks do not support the above UNC proposal.

In considering the merits of this proposal, we are concerned that this specific issue has had insufficient evidence of its benefits supplied and that further focused analysis would be required.

The existing processes have been shown to be robust and their sustainability for the foreseeable future is not in question.

We believe the proposal may create uncertainty as it would give Networks the option of selecting either of the two outputs. This potential divergence of approach across Networks would result in different models serving the same end, which could alter year on year.

At this stage therefore, we are unable to support the proposal.

Regards

Robert Cameron-Higgs  
NGN  
Network Code Manager