

UNC Mod Panel Secretary  
Joint Office of Gas Transporters  
31 Homer Road  
Solihull  
West Midlands  
B91 3LT

09 April 2009

Dear John,

Re: **UNC Modification Proposal 0247 – Alignment Of Interruption Application Rules for Annual and Ad-Hoc Applications**

Thank you for the opportunity to respond to this Modification Proposal. Northern Gas Networks (NGN) fully supports this modification proposal.

NGN believes that by allowing the inclusion of Interruption Applications for Y+1 to Y+3 to be included within the Annual Interruption Invitation, rather than requiring an additional Ad-hoc Interruption Application where requirements exist for those years, will benefit the industry by streamlining the existing processes and reducing administrative burden on all Users, thereby better facilitating Standard Special Condition A11(f).

NGN also believes that Standard Special Condition A11(a) would also better facilitated by enabling the Distribution Networks the as much time as potentially possible to accept Interruption bids in the Y+1 to Y+3 timeframe, thereby avoiding the possibility of inefficient and unnecessary capital expenditure.

Yours sincerely,



Joanna Ferguson  
Network Code Manager