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12<sup>th</sup> June, 2009.

Your Reference: Modification Proposal 0250.

**Re: Modification Proposal 0250: 'Introduction of the Code Contingency Guidelines Document'**

Dear John,

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 and welcomes the introduction of consolidated UK Link contingency procedures as an annex to the UK Link Manual. The current arrangements in relation to Gemini contingency are outdated and this Proposal will improve visibility of these procedures and their accessibility, aspects which are critical to any useful contingency arrangements.

The Proposal appears in the main to represent the findings and recommendations of Review Group 0217. The principal difference being that the Review had concluded that the guidelines would become a UNC Related Document (V12) and governed in this way. For reasons that they have articulated the Proposer has concluded that annexing the document to the UK Link Manual will prevent any dual governance issues.

NGD believes that Review Group fully considered and identified the instances where it is necessary to modify parts of the UNC for the period of a contingency and these are reflected in the proposed legal text.

The requirement for mandatory participation (on at least a biennial basis) in testing of Gemini contingency, applicable to all Users, will improve participant knowledge. This will be invaluable in the event and will help to ensure that all parties are able to fulfill their contractual requirements. NGD notes that these requirements have been included within chapter 4 of the Code Contingency Guidelines Document.

NGD agrees with the comments put forward in the Draft Modification Report in relation to the Relevant Objectives particularly in relation to the better facilitation of SSCA11.1 (a) "*...the efficient and economic operation of the pipe-line system..*" on the basis that clear, accessible and regularly tested contingency processes are an essential part of any successful operation.

Please contact Alison Chamberlain on 01926 653994 ([alison.chamberlain@uk.ngrid.com](mailto:alison.chamberlain@uk.ngrid.com)) should you require any further information with respect to the above.

Yours sincerely

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