

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

06 November 2009

Dear John,

Re: **UNC Modification Proposal 0255 – Publication of Objection Rates for LSP Supply Points**

Thank you for the opportunity to respond to this Modification Proposal. Northern Gas Networks (NGN) does not support this modification proposal.

NGN understands that the proposer wishes to highlight to the industry, and publish into the public domain, a report which will show limited data in relation to individual Users use of the LSP Supply Point Objection as allowed within UNC section G2.8. This is an inter-shipper process to reduce erroneous transfers to which the Transporters are neutral. In light of this, NGN does not believe that it is appropriate to obligate Transporters to publish the information requested in this modification proposal through UNC governance.

The Rough Order of Magnitude (ROM) which was produced for this proposal indicates that there are costs of between £4,000 and £26,000 associated with implementation of the proposal. It is NGNs believe that this should therefore be a User Pays modification with the costs targeted at the perceived beneficiaries. The level of such costs should not be used to determine the assignment of costs and NGN is opposed to this being funded by Transporters purely based on this criteria.

I hope these comments will assist. Please contact me should you require any further information in respect of this response.

Yours sincerely,



Joanna Ferguson
Network Code Manager