

Bob Fletcher
Joint Office of Gas Transporters
31 Homer Road
Solihull
B91 3LT

19 May 2011

Dear Bob,

Re: UNC Modification Proposal 0312 – Introduction of Two-thirds Majority Voting Mechanism to the UNC Modification Panel

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) does not support this Modification Proposal. Please find below NGNs comments in respect of the Modification Proposal.

NGN does not support this Modification proposal.

NGN Stance:

There is an assumption in this Modification that UNC parties may not fully consider the Relevant Objectives in coming to a recommendation for Modifications that have been raised as a result of a Significant Code Review (SCR). NGN does not agree with this and believes that although there may be justification for considering other factors when assessing such Modifications, these are not considered or addressed by amending the existing voting arrangements in the UNC.

It is further unclear that this amendment to the UNC will have the desired effect on parties' right of appeal under the Electricity and Gas Appeals (Designation and Exclusion Order).

Relevant Objectives:

As NGN does not believe that this Modification will necessarily achieve the desired effect, we are therefore unable to consider that it could better the relevant objectives.

Implementation:

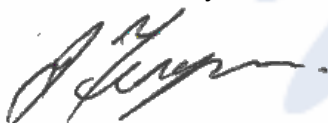
NGN does not envisage that implementation of this Modification would incur any costs and that it could be implemented immediately if directed to do so by the Authority.

Legal Text:

NGN has no comments on the legal text.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,



Joanna Ferguson
Network Code Manager