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Dear Bob,

**0324V - Code Governance Review: Significant Code Reviews
0319V, 0322V, 0323V and 0325V**

Thank you for your invitation seeking representations with respect to the above Modification Proposals. This response is on behalf of National Grid Transmission.

Modification 0324V

As proposer of 0324 Modification Proposal National Grid Transmission offers support to the Proposal. We have the following comments on the benefits of the modification proposal;

National Grid Transmission support Ofgem leading on Significant Code Reviews (SCRs) to address cross code issues and / or implement complex industry projects, on this should avoiding an inefficient piecemeal approach to change. We therefore also support the UNC change to not allow modification proposals that are related to the subject matter of a SCR to be raised during the period of an SCR, unless Ofgem approves otherwise, as this will reduce duplication of effort and therefore also aid efficient code administration. Although this proposal introduces a process to deal with SCR related proposals that are raised during an SCR phase we anticipate that these rules will encourage active participation in the Review itself.

Relevant Objectives

Modification Proposal 0324 proposes amendments to the Modification Rules and as such the Modification Proposals should be judged against how the modification better facilitates paragraph 1c, 1f and 9 of Standard Special Condition A11. By implementing the licence obligations that seek to implement the objectives of Code Governance set out in Ofgem's review, we believe that this proposal promotes the efficient implementation and administration of the Uniform Network Code and better facilitate the efficient discharge of the duties associated with the licence in relation to the Uniform Network Code and therefore improve the current position.

We also feel that that the recent variation request issued for 0324 provides useful additional clarification.

Modification 0319V, 0322V, 0323V and 0325V

On 11th October we responded to the consultation with regards to 0319, 0322, 0323 and 0325, and note that these have now been varied and the consultation extended. We have nothing further to add to our previous response in relation to the varied proposals as we feel the changes made were immaterial.

In summary we support 0319V, 0322V, 0323V, 0324V and 0325V.

Please let me know if you require any further information to enable preparation of the Final Modification Report.

Yours sincerely

Beverley Viney