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7<sup>th</sup> October 2010.

Your Reference:UNC Modification Proposal 0328.

**Re: UNC Modification Proposal 0328:**  
**'Proposal to amend Annex A of the CSEP NExA by replacing the current version of the AQ Table'**

Dear Bob,

Thank for your invitation seeking representations with respect to the above Modification Proposal. National Grid Gas Distribution (NGD) supports implementation as we believe it would better facilitate the relevant objective of the securing of efficient competition between relevant Shippers and between relevant Suppliers. This would be achieved by utilisation of the latest seasonal demand data to estimate the likely consumption at a new CSEP Supply Point where there is insufficient consumption history to enable an assessment to be made based upon historic Meter Readings. Such assessments of demand (based on Annual Quantity (AQ) table values and upon Meter Readings) are periodically communicated to the upstream Transporter and have a direct impact on the apportionment of Transportation and Energy charges levied pursuant to the UNC.

Pursuant to section H1.5.4 of the UNC Transportation Principal Document, Transporters are required to review, and where appropriate revise, the seasonal normal value of the Composite Weather Variable every 5 years from 2010. New values will be effective from 1 October 2010.

The purpose of the AQ table located within Annex A Part 8 of the LDZ CSEP NExA is to provide a reasonable assessment of the AQ for new CSEP Supply Points where there is insufficient consumption data to derive an AQ from consumption history in accordance with the provisions of the iGT UNC. This Proposal seeks to update the values within the AQ table to reflect the impact of revised seasonal normal values. NGD agrees that the proposed AQs have been calculated correctly taking account of these revised values.

We note that the table contained within UNC TPD Section G, Annex G-3 as introduced by UNC Modification 0099 was intended to mirror the CSEP NExA AQ table (being a reasonable assumption of consumption at various property sizes) and we therefore support the associated amendment of the values within this table as proposed.

Please contact me on 01926 653541 (chris.warner@uk.ngrid.com) should you require any further information.

Yours sincerely,

Chris Warner  
Network Code Manager, Distribution.