

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

19 May 2011

Dear Bob,

**Re: UNC Modification Proposal 0367 - Interruptible to Firm - Supply Point Transition**

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) is supportive of this Modification Proposal. Please find below NGNs comments in respect of the Modification Proposal.

**NGN are supportive of this Modification Proposal.**

**Summary:**

The Proposal sets out a series of Supply Point Administration (SPA) steps that Users will be required to carry out to ensure all Interruptible Supply Points are recorded on the Supply Point Register as 'Firm' with effect from 1st October 2011. The Proposal also permits Transporters to take certain actions where those steps are not carried out by the User.

**NGN Stance:**

NGN are supportive of this Modification Proposal. The proposals would not lead to permanent changes of the UNC or obligations on Users, however by keeping the suggested SPA restrictions to a minimum they are the most efficient way of ensuring that Interruptible Supply Points are registered correctly as Firm and aligned with both their contractual and operational statuses as envisaged by Mod 90.

The additional "Back-Stop" process for Transporters to manually implement a change where such steps are not carried out by the User ensures that all Interruptible Supply Points will be correctly recorded by 1 October 2011.

**Relevant Objectives:**

This Modification Proposal would better further Relevant Objective (f); the promotion of efficiency in the implementation and administration of the UNC as the proposals contained in the Modification are the most efficient way of ensuring Interruptible Supply Points are registered correctly according to the UNC.

**Self Governance:**

NGN agree that this Modification should follow Self Governance procedures.

**Implementation:**

NGN agree with the proposed implementation date of 15 days after a decision has been made by the Modification Panel.

**Legal Text:**

There is no formal legal text associated with this Modification Proposal, but suggested text was provided by the Proposer at the Workgroup meeting in March which NGN believes is consistent with the intent of the Modification. NGN agrees that this should be included in the Transition Document as this Modification is not making permanent changes to the UNC.

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