

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

Alison Chamberlain
National Grid
Network Code,
Distribution
Alison.chamberlain@uk.ngrid.com
Direct tel +44 (0)1926 65 3994

www.nationalgrid.com

2nd September 2011
Your Reference:UNC Modification Proposal 0372

Re: UNC Modification Proposal 0372:
Code Governance Review Licence Compliance Changes

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal for which National Grid Gas Distribution (NGD) would like to offer comments.

Do you support or oppose implementation?

Support.

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

Certain Licence compliance issues were raised by the Authority in their decision letters relating to the suite of Code Governance Review Modification Proposals (0318-0325V). National Grid Gas Transmission obtained further clarification from Ofgem on these matters and has sought to improve consistency between the Modification Rules and the Licence. The intent of the Codes Governance review was to improve consistency across the Codes to support efficient administration. This Proposal if implemented would further improve this position and consequently National Grid Gas Distribution would like to offer support.

Are there any new or additional issues that you believe should be recorded in the Modification Report

No.

Self Governance Statement:

Do you agree with the Modification panel's decision that this should be a self-governance modification?

Yes.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Standard Special Condition A11.1 (c): Efficient discharge of the licensee's obligations.

Standard Special Condition A11.1 (f): So far as is consistent with subparagraphs (a) to (e) the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.

NGD concurs with the comments in the Draft Modification Report in relation to the better facilitation of these Relevant Objectives.

Impacts and Costs:

None.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

Legal Text:

NGD is content that the legal text reflects the intent of the Proposal and supports the variations put forward by National Grid Gas Transmission.

Is there anything further you wish to be taken into account?

No.

NGD has not identified any such matters.

We trust that this information will assist in the compilation of the Final Modification Report.

Please contact me on 01926 653994 (alison.chamberlain@uk.ngrid.com) should you require any further information

Yours sincerely,

Alison Chamberlain
Network Code,
National Grid Gas Distribution