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7<sup>th</sup> September, 2012

Your Reference: UNC Modification Proposal 0384S.

Re: UNC Modification Proposal 0384S UNC Modification Rules; housekeeping, clarity and minor drafting changes.

Dear Bob,

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

### **Do you support or oppose implementation?**

Support.

### **Please summarise the key reason(s) for your support.**

NGD concurs with the Proposer that the housekeeping changes identified within the Modification Proposal remove ambiguity and provide clarity within the UNC Modification Rules, including the definition of 'Panel Majority'. NGD also agrees that the proposed changes to Legal Text provision would ensure properly developed Legal Text is available at the point a Modification Proposal is issued to consultation.

### **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?*

The Modification Proposal clarifies and corrects a number of areas within the Modification Rules, amends the process for provision of legal text and clarifies the Panel Majority definition.

As such NGD believe that the Proposal as drafted facilitates GT Licence Standard Special Condition A11.1 (f): so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.

**Impacts and Costs:**

It is not anticipated that there will be any significant costs incurred on UNC parties. NGD is not aware of any other impacts.

**Implementation:**

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

We have nothing to add to the information identified within the Draft Modification Report.

**Legal Text:**

NGD is satisfied that the Legal text as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

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

No.

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

Please contact me on 01926 655299 ([andy.clasper@nationalgrid.com](mailto:andy.clasper@nationalgrid.com)) should you require any further information.

Yours sincerely,

Andy Clasper  
National Grid Gas, Distribution