

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

Alan Raper
Network Code,
National Grid Gas Distribution.
Alan.raper@uk.ngrid.com
Direct tel +44 (0)1926 65 3559

www.nationalgrid.com

16th November, 2011

Your Reference: UNC Modification Proposal 0385.

Re: UNC Modification Proposal
0385: Inclusion of DNOs as Users in User Pays Arrangements.

Dear Bob,

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

Do you support or oppose implementation?

0385: Support

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

We believe that implementation would serve to clarify the status of DNO Users regarding the apportionment of costs in the user pays process, where it is proposed that the DNO should receive a share of the costs in their capacity as user, (or recipient), of the service being modified. As such, implementation will be a positive improvement to the understanding and operation of the user pays recharging principles.

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

None identified.

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?

We believe that implementation is primarily a matter of introducing more clarity into the user pays arrangements. Therefore, we believe the only relevant objective furthered is (f), in so far as the additional clarity will serve to "promote efficiency in the implementation and administration of the UNC"

Impacts and Costs:

None

Implementation:

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

No lead time is necessary as no system changes will be made as a result of implementation of this Modification.

Legal Text:

NGD is satisfied that the 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?

NGD has not identified any such matter.

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

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

Yours sincerely,

Alan Raper
Network Code, Distribution