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16th November, 2011

Your Reference:UNC Modification Proposal 0389.

Re: UNC Modification Proposal
0389: Simplification of points of telemetry.

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?

0389: Support

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

The System Operations Managed Service Agreement (SOMSA) came into effect on the 1st May 2005 and set out the terms and conditions under which National Grid Gas (NGG) managed gas networks on behalf of the independent Distribution Network Operators (iDNs).

The Enduring Distribution Networks Arrangements (EDNA) Project Team was established by UNC Transporters to discuss what arrangements were required to manage the interface arrangements between the Transmission and the Distribution Network Operator systems post SOMSA. The EDNA Project Team recommended that OAD Section E Annex E-1 be amended to reflect the proposed operational practice and the interface between the Distribution Networks Control System (DNCS) and National Grid Transmission's systems.

The Modification rationalises the points of telemetry required and proposes to simplify the current tables. It reflects the recommendations of EDNA and will align the OAD with current requirements. Consequently National Grid Gas Distribution is supportive of the Proposal which has improved clarity and removed some redundant provisions.

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?

- Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.
Implementation of this Modification Proposal would rationalise the transfer of data between DNs and NTS whilst still ensuring that the correct information is transferred.
- Promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.
National Grid Gas Distribution agrees with the comments in the Draft Modification Report in relation to the better facilitation of this objective.

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 (alison.chamberlain@uk.ngrid.com) should you require any further information

Yours sincerely,

Alison Chamberlain
Network Code, Distribution