

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

16 November 2011

Dear Bob,

Re: UNC Modification Proposal 0389: Simplification of Points of Telemetry

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

NGN offers qualified support for this Modification proposal.

Summary of key reasons:

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 System Operator Managed Service Agreement (SOMSA).

One of the recommendations of the EDNA Project Team was that the points of telemetry as defined within the Offtake Arrangements Document (OAD), Section E Annex E-1, be revised to reflect the operational requirements as identified in the development of the Distribution Networks Control System (DNCS).

NGN has some concern that the modification changes the base requirements where some equipment is not currently installed at an offtake to make the data obligated in all cases instead of only where the equipment is installed. NGN does not believe that this was the intention of the modification and believes that this can be suitably amended to ensure that the change does not implement an obligation to install new equipment at sites.

Additional or new issues:

N/A

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?

Condition	Description	NGN View
A11.1(a)	Efficient and economic operation of the pipe-line system	None
A11.1(b)	Efficient and economic operation of the	By amending the code to reflect the

	combined pipe-line systems	current operational requirements for the points of telemetry data it will improve the efficiency and economic operation of the combined pipe-line systems.
A11.1(c)	Efficient discharge of the licensee's obligations	None
A11.1(d)	Securing effective competition: i) Between shippers ii) Between suppliers iii) Between DN operators and shippers	None
A11.1(e)	Provision of economic incentives for security of supply to domestic customers	None
A11.1(f)	Promote efficiency in the implementation and administration of the UNC	None

Impact and costs:

We agree with the Proposer that, subject to the amendment noted above to make the requirements where equipment is already installed, that there will be no costs associated with the implementation of this Modification Proposal.

Implementation:

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

As a self-governance Modification it could be implemented 16 Business Days after a Modification Panel vote to implement it.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes, subject to the note above relating to equipment already being installed

Any further information:

N/A

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