

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

5 April 2012

Dear Bob,

**Re: UNC Modification Proposal 0389VS - Simplification of points of telemetry**

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) supports this Modification Proposal. Please find below NGN's comments in respect of the Modification Proposal.

**NGN supports this Modification proposal.**

**Summary of key reasons:**

NGN are supportive of this Modification Proposal as it brings Annex E-1 of the OAD up to date with the accepted information exchange between NGN and UKT.

We are also satisfied that concerns surrounding the legal text that were raised in previous representations have been addressed.

**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	
A11.1(b)	Efficient and economic operation of the combined pipe-line systems	By amending the code to reflect the 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	
A11.1(d)	Securing effective competition: i) Between shippers ii) Between suppliers iii) Between DN operators and shippers	
A11.1(e)	Provision of economic incentives for security of supply to domestic customers	
A11.1(f)	Promote efficiency in the implementation and administration of the UNC	

**Impact and costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

We agree with the Proposer 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?*

We are satisfied that concerns surrounding the legal text have been sufficiently addressed and it is now acceptable.

**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