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Your Reference: UNC Modification Proposal 0397S.

Re: UNC Modification Proposal
0397S: Amendments to Section I of the OAD to reflect Offtake Profile Notice rules & recognition of different NTS/LDZ Offtake

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

In NGD's opinion, implementation of this Modification Proposal is consistent with facilitation of the GT Licence relevant objectives. It is neither possible nor necessary for all NTS/LDZ Offtakes to operate within the existing tolerances set out in OAD. If implemented the Proposal would remove the "one size fits all" treatment of these Offtakes by categorising them as either Designated or Non-Designated. This is necessary to recognise the differing nature/significance of these Offtakes e.g. pressure controlled or volumetric control. Non-Designated Offtakes would be required to operate within an OPN tolerance of 1mcmd and Designated Offtakes would be required to operate to a tolerance which would be specified in the Offtake's Supplemental Agreement. This will allow the appropriate focus to be given to certain Offtakes. Amendments to the application of aggregate LDZ OPN tolerances are proposed, to capture specific scenarios where bespoke UNC rules are appropriate for specific LDZs. Additionally some operational changes are also proposed:

- relaxation of frequency in which a DNO can submit revised Offtake Profile Notices;
- removal of requirement to specify Operational circumstances for a DNO flow swap request;
- extension of area for DNO flow swap request from NTS Exit Zone level to LDZ level (providing for consistency with National Grid NTS).

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?

Standard Special Condition A11.1 (b) "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.

Allowing flows to be transferred between Offtakes within the LDZ at the request of either a DNO or NTS is consistent with the better facilitation of this Relevant Objective.

Standard Special Condition A11.1 (f) "promotion of efficiency in the implementation and administration of the Code":

Amending OAD to recognise differing operational requirements and focusing efforts on addressing the requirements of particular Offtakes is consistent with the promotion of this Relevant Objective.

Impacts and Costs:

No costs or adverse impacts have been identified.

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 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 653994 (alison.chamberlain@nationalgrid.com) should you require any further information.

Yours sincerely,

Alison Chamberlain
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