

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

2 March 2012

Dear Bob,

**Re: UNC Modification Proposal 0399**

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) does not support this Modification Proposal. Please find below NGN's comments in respect of the Modification Proposal.

**NGN does not support this Modification proposal.**

**Summary of key reasons:**

While NGN agree in principle to theft reporting we do not support this particular Modification Proposal due to concerns about the lack of development relating to the specific data items that will be included in the report. These remain poorly defined and we have concerns about them being released into the public domain in this situation where people may not fully understand what the data represents. If a similar Modification Proposal came forward in the future, which was subject to proper development then we would reconsider our position. Proper development of theft reporting should take place in the appropriate forum and we are mindful that there is work being carried out through SPAA to assess best practice for theft investigation and we believe that other work which is in progress together with the Ofgem decision on UNC Modifications 231, 277 and 346 may influence the appropriate future reporting requirements.

**Additional or new issues:**

We have identified no new or additional issues.

**Self Governance Statement:**

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

N/A

**Impact and costs:**

We have concerns about the potential reputational impact on industry parties as a result of poorly defined data which may be misinterpreted being released into the public domain. Notwithstanding this issue, we accept the impact and costs as defined in the Modification Proposal.

**Implementation:**

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

We are satisfied with the lead-time as outlined in the Modification Proposal.

**Legal Text:**

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

Yes.

**Any further information:**

No.

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