

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

30 March 2012

Dear Bob,

Re: UNC Modification Proposal 0400 - Removal of obligation to install duplicate Telemetry Equipment

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 believe that the proposals put forward in the Draft Modification Report are sensible and support their implementation.

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	Implementation of this Modification Proposal would improve the economic operation of the NGT pipe-line system due to reduced telemetry equipment costs to the industry.
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:

NGN agree with the impact and costs outlined in the Draft Modification Report.

Implementation:

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

We are happy for this Modification Proposal to follow the standard implementation lead-time for a Self-Governance Modification Proposal.

Legal Text:

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

Yes.

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,



Alex Ross
 Network Code Officer