

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

30 March 2012

Dear Bob,

Re: UNC Modification Proposal 0401S - Amendments to the provisions for agreeing pressures at the Offtakes from the National Transmission System to Distribution Networks.

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 the implementation of this Modification Proposal. If the Modification Proposal is implemented it will introduce a procedure to agree pressures between National Grid NTS and each Distribution Network Operator at significant offtakes, which will reduce the administrative burdens on both sides. We are satisfied that safeguards are in place to preserve the pressure we use as a planning minimum pressure and therefore have no objectives to this Modification Proposal being implemented.

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	

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	By reducing administrative burdens implementation of this Modification Proposal would further this Special Condition.

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