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02nd March 2012

Your Reference:UNC Modification Proposal 0396 & 0403

UNC Modification Proposals 0396 'EU Third package: Three week switching' & 0403 'EU Third Package: 21 day switching with flexible objection period'

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposals. National Grid Gas Distribution (NGD) would like to support each of these albeit with a preference for 0403.

Do you support or oppose implementation?

Support both Modification Proposals.

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

NGD supports implementation of either of these Modification Proposals on the basis that they are required to facilitate a new Supplier licence condition requiring suppliers to have the ability to complete a registration of change of supplier within 21 calendar Days. We believe 0403 offers a simpler remedy requiring less significant change to systems and a reduced impact on the UNC hence our preference for that solution.

Are there any new or additional issues that you believe should be recorded in the Modification Report

We have not identified any such issues.

Self Governance Statement:

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

Not applicable.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

NGD concurs with the statement in the 0403 Draft Modification Report that the Proposal "allows Shippers and Suppliers to meet their respective licence conditions and comply with the requirements of the EU Third Energy Package" and also in the 0396 Draft Modification Report that the Proposal was "raised to facilitate compliance with the Regulation".

Impacts and Costs:

Medium level implementation costs would be incurred by Transporters as a consequence of implementing either Modification Proposal. We understand these would be borne by Users under User Pays arrangements.

Implementation:

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

Systems development work would be required to facilitate implementation of either Modification Proposal.

Legal Text:

NGD has provided legal text for both Modification Proposals. We have received approval for the drafting from the Proposers.

Is there anything further you wish to be taken into account?

No further matters have been identified.

We trust that this information will assist in the compilation of the Final Modification Report.

Please contact me on 01926 653541 (chris.warner@uk.ngrid.com) should you require any further information

Yours sincerely,

Chris Warner
Network Code Manager, Distribution