

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

5 April 2012

Dear Bob,

Re: UNC Modification Proposal 0409 – Removing the restriction of the Users’ application quantity for Annual NTS Exit (Flat) Capacity

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) is supportive of this Modification Proposal. Please find below NGNs comments in respect of the Modification Proposal.

NGN are supportive of this Modification.

Summary of key reasons:

NGN agrees that this Modification will provide Users with a greater opportunity to successfully apply for Annual NTS Exit (Flat) Capacity and will remove a potential discrimination against single-User Exit Points.

Additional or new issues:

N/A

Self Governance Statement:

Yes

Relevant Objectives:

NGN considers that this Modification [does not] facilitates the relevant objectives as indicated by the proposer. Specifically, NGN considers:

Condition	Description	NGN view
A11.1(a)	Efficient & economic operation of the pipe-line system	
A11.1(b)	Efficient & 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 & shippers	
A11.1(e)	Provision of economic incentives for security of supply to domestic	

	customers	
A11.1(f)	Promote efficiently in implementation & administration of the UNC	NGN believes that by changing the UNC to reflect more efficient working practice administrative burden will be reduced.
A11.1 (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	

Impacts and costs:

No costs anticipated.

Implementation:

NGN agrees with the proposed implementation timescales contained within the Draft Modification Report.

Legal text:

No issues arising.

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,



Joanna Ferguson
 Network Code Manager