

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

11 June 2012

Dear Bob,

**Re: UNC Modification Proposal 0414S - Discontinuation of ANS usage for Interruption Communications by Transporters**

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 support this proposal as no shippers use the ANS within UK Link Services and therefore it is no longer required. As this proposal does not remove usage of ANS for other National Grid NTS communications there is no negative industry impact and there will be a potential cost saving for DNOs if the proposal is 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	By removing a redundant system that potentially imposes an unnecessary cost

		on DNOs this will better facilitate the 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	The removal of a redundant system will promote efficiency in the implementation and administration of the UNC.

**Impact and costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

N/A

**Implementation:**

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

We are satisfied with a lead-time of 16 business days after the Mod Panel directs to implement as per standard self-governance procedures.

**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