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Your Reference: UNC Modification Proposal 0414S.

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

Dear Bob,

Thank you for your invitation seeking representation with respect to the above Modification Proposal, which National Grid Gas Distribution (NGD) would like to support.

Do you support or oppose implementation?

Support.

Please summarise the key reason(s) for your support.

National Grid Gas Distribution believes that it is appropriate to remove an obligation to maintain a service that is not required/redundant (within the distribution environment).

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

No

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?

NGD agrees that this proposal promotes the following Relevant Objectives:

- Achievement of relevant objective (c) "Efficient discharge of the licensee's obligations"
- Achievement of relevant objective (f) "Promotion of efficiency in the implementation and administration of the Code".

Standard Special Condition A11.1 (c) Efficient discharge of the licencees's obligations.

Impacts and Costs:

It is anticipated that implementation will cause a minor reduction in operating costs for DNOs.

Implementation:

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

Implementation would be anticipated in-line with Self Governance procedures.

Legal Text:

NGD is satisfied that the text as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

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

No.

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

Please contact me on 01926 653994 (alison.chamberlain@nationalgrid.com) should you require any further information.

Yours sincerely,

Alison Chamberlain
National Grid Gas, Distribution