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7th September, 2012

Your Reference: UNC Modification Proposal 0416S.

Re: UNC Modification Proposal 0416S Extending the data provision permissions created by Modification 0279 regarding historic asset and read data provision.

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.

NGD concurs with the proposer that the provision of more frequent (monthly) historic Meter Information and Meter Reading history to Users would lead to quicker and more timely resolution of data discrepancies and therefore ultimately assist with the AQ review.

We also agree that timely availability to incoming Users of Meter Reading history and Meter Information provides a 'level playing field' concerning data transparency and would therefore remove any current inequity.

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?

The Modification Proposal essentially enables timely and more frequent provision of information to an incoming User which would facilitate a 'level playing field' and support a more thorough AQ review process. NGD therefore believe that the Proposal as drafted facilitates GT Licence Standard Special Condition A11.1 (d): so far as is consistent with subparagraphs (a) to (c) the securing of effective competition:

- (i) between relevant shippers;
- (ii) between relevant suppliers;

Impacts and Costs:

It is not anticipated that this would cause any significant costs to be incurred or have any negative impacts.

Implementation:

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

We have nothing to add to the information identified within the Draft Modification Report.

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 655299 (andy.clasper@nationalgrid.com) should you require any further information.

Yours sincerely,

Andy Clasper
National Grid Gas, Distribution