

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

7 September 2012

Dear Bob,

Re: UNC Modification Proposal 0420 - New Connections Interruptible loads

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:

This modification is proposing to amend the UNC so that it allows end users/shippers who wish to have a new supply point the facility to connect as an interruptible customer. This will allow them to benefit from the interruptible sites process.

We believe these amendments would be a positive change from the existing process where end users/shippers have to wait for the investment to be completed and will consequently benefit customers and their businesses. By proposing a zero charge there will be no discrimination against existing end users/shippers therefore not violating Relevant Objective A11.1(d), the securing of effective competition.

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?

N/A

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	By allowing early utilisation of the network capacity it will further this objective.
A11.1(b)	Efficient and economic operation of the combined	By allowing early utilisation of the network capacity it will

	pipe-line systems	further this objective.
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 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	

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 the text in the Modification Proposal supporting immediate implementation.

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-Shaw
Network Code Officer