

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

10 December 2013

Dear Bob,

Re: UNC Modification Proposal 0448 - Aligning UNC with Licence Conditions relating to European legislative change and Alternative Modification Proposals

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:

If implemented this proposal will ensure the UNC is aligned with the relevant European legislation.

Additional or new issues:

NA

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

NA

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	Supports this relevant objective.
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	
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	Supports this relevant objective.

Impact and costs:

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

NA

Implementation:

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

This can be implemented immediately upon direction from the Authority.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes.

Any further information:

NA

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