



Hinckley Operational Centre
Brick Kiln Street
Hinckley
Leics
LE10 0NA

National Gas Emergency Service - 0800 111 999* (24hrs)
*calls will be recorded and may be monitored

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5th February 2015
Your Reference:UNC Modification Proposal 0479S

UNC Modification Proposal 0479S - Inclusion of email as a valid UNC communication

Dear Bob,

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

Do you support or oppose implementation?

Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition:

The proposal identifies valid and compelling arguments to allow the use of email as a method of Code Communication. Fax, for example is increasingly viewed as an outmoded method of communication with e-mail clearly being the preferred approach.

Recent experience also shows that the use of e-mail as a form of Code Communication could provide significantly more flexibility to the industry, for example to Shippers, Transporters and Xoserve, when identifying and developing future industry 'change' solutions and as a consequence facilitates cost and time efficiency.

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

We have not identified any such issues.

Self Governance Statement:

We agree that this Modification Proposal should be subject to self-governance procedures.

Relevant Objectives:

Relevant Objective f) Promote efficiency in the implementation and administration of the UNC

NGD concurs with the statement in the Draft Modification Report that this Modification Proposal would promote the efficiency in the implementation and administration of the UNC.

Impacts and Costs:

We agree with the statement in the Draft Modification Report concerning the funding of this Modification Proposal and we have no further comment in this respect.

Implementation:

This Modification Proposal can be implemented 16 days after determination by the UNC Modification Panel.

Legal Text:

We have identified what we believe to be an anomaly within the Legal text – Section U 1.2.7

The text states *"Where the UK Link Committee considers and revises from time to time the means by which a Code Communication may be given as set out in the UK Link Manual it shall notify the UNC Committee within a reasonable period of those changes."*

The effect of this would be to place a UNC obligation on a non-code party (being the UK Link Committee). We would recommend consideration of an alternative solution that didn't include the stated UNC obligation.

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

We have not identified any further issues or concerns.

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
Stakeholder Specialist