

Bob Fletcher
Joint Office of Gas Transporters
Consort House
Princes Gate Buildings
6 Homer Road
Solihull
B91 3QQ

3 September 2014

Dear Bob,

Re: UNC Modification Proposal 0513 – UK Link Programme (Project Nexus) – independent project assurance for Users

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) is supportive of this Modification Proposal. Please find below NGNs comments in respect of the Modification Proposal.

NGN are supportive of this Modification.

Summary of key reasons for support/opposition:

NGN agrees with the proposer that the UK Link Programme and regime changes associated with the implementation of the Project Nexus Modifications will need assurance that all Shipper Users are ready for the large scale changes associated with it. This is especially important at a time when there is significant other industry change being implemented at the same time. The assurance analysis proposed through this Modification is consistent with that being undertaken within Xoserve and will enable Shipper Users to provide confidential information to the Authority that they may not wish to share with other Users through existing industry processes such as the UK Link Committee, which is the usual route for ensuring change implementation.

Additional or new issues:

NGN does not believe that the variation requested during the consultation process is material.

Self Governance Statement:

NGN agreed that Urgent status is appropriate for this Modification due to the timescales associated with initiating the assurance work and having it completed.

Relevant Objectives:

NGN considers that this Modification [does not] facilitates the relevant objectives as indicated by the proposer. Specifically, NGN considers:

Condition	Description	NGN view
A11.1(a)	Efficient & economic operation of the pipe-line system	N/A
A11.1(b)	Efficient & economic operation of the combined pipe-line systems	N/A
A11.1(c)	Efficient discharge of the licensee's obligations	N/A
A11.1(d)	Securing effective competition:	N/A

	i) between shippers ii) between suppliers iii) between DN operators & shippers	
A11.1(e)	Provision of economic incentives for security of supply to domestic customers	N/A
A11.1(f)	Promote efficiently in implementation & administration of the UNC	Assurance of ongoing day-to-day operational readiness at times of significant change will ensure that the UNC arrangements continue to operation efficiently

Impacts and costs:

NGN agrees with the proposal

Implementation:

NGN agrees with the proposal

Legal text:

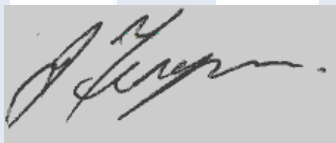
NGN agrees that the amended legal text will deliver the appropriate arrangements

Any further information:

While we note that other means of obtaining assurance, and funding it may be available, we agree that the most efficient manner of doing so is as proposed.

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,



Joanna Ferguson
Network Code Manager