

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

15 January 2015

Dear Bob,

**Re: UNC Modification Proposal 0521 - Revision of User Admission Criteria to include Transporter verification of its ability to transact with the Applicant User**

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:**

We support Mod 521 as it better facilitates the admission criteria under UNC and reduces the risk of missed payments thereby decreasing the risk of bad debt being passed to other Users.

**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	
A11.1(d)	Securing effective competition: i) Between shippers	By reducing the risk of bad debt being passed to other

	ii) Between suppliers iii) Between DN operators and shippers	Users this will better facilitate competition.
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?*

There are no impacts on NGN if this modification were implemented.

**Implementation:**

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

We would like to see implementation as soon as possible after an implementation decision had been made.

**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

