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Your Reference:UNC Modification Proposal 0535

UNC Modification Proposal 0535 – Implementation of Non Effective Days to enable Annual AQ Review  
(independent of Nexus transition)

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:**

Modification 0477 reduced the period between the end of the Objection Deadline and the Supply Point Registration Date from 7 to 2 Business Days. This has a consequential impact on the timescales required to process the large quantities of data to manage the 2015 Annual AQ review. This Modification proposes a pragmatic solution which does not impact on overall Shipper switching timescales and can be implemented without the need for costly system changes/development.

**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 is a not a self-governance modification because it may have a material impact on existing and new gas consumers and competition.

## **Relevant Objectives:**

- d) Securing of effective competition:
  - (i) between relevant shippers;
  - (ii) between relevant suppliers; and/or
  - (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.
  
- f) Promotion of efficiency in the implementation and administration of the Code.

NGD concurs with the comments in the Draft Modification Report concerning the facilitation of these relevant objectives.

## **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:**

We are in agreement with the implementation timescales identified within this Modification Proposal.

## **Legal Text:**

NGD is satisfied that the drafting as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

## **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](mailto:andy.clasper@nationalgrid.com)) should you require any further information.

Yours sincerely,

Andy Clasper  
National Grid Distribution