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09 September 2016  
Your Reference:UNC Modification Proposal 0574

UNC Modification Proposal 0574 – Creating the permission to release supply point data to the Theft Risk Assessment Service (TRAS)

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 offer support.

**Do you support or oppose implementation?**

Support

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

This is an enabling modification which will provide the necessary permissions for Transporters to release a small number of data items via a quarterly DVD to the TRAS. We support this modification as it may assist in helping reduce occurrences of gas theft within the industry.

**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.

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:**

The Legal Text provided was written contingent upon 0584 being implemented; the Legal Text documents an 'either' 'or' option. The 'or' option, which I understand will be incorporated into UNC if the modification is implemented, incorrectly references ETTOS rather than TRAS.

## **Modification Panel Members have requested that the following questions are addressed:**

*Q1: To inform Panel's consideration of self-governance, views are requested as to whether respondents believe that releasing these data items represents a material impact on commercial arrangements for either / both Shippers and Transporters.*

Release of the data does not appear to represent a commercial impact on Transporters but if not handled correctly could represent a data protection risk.

## **Views on errors or omissions in the Modification Report which should be taken into account:**

We have not identified any such errors or omissions.

## **Additional analysis or information to support your representation:**

We have nothing further to add.

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