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09 September 2016  
Your Reference:UNC Modification Proposal 0589S

## UNC Modification Proposal 0589S – Inclusion of CSEP Meter Supply Points within NDM Sampling Arrangements

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:**

Whilst modification 0440 restricted the use of CSEP Supply Meter Point data within NDM sampling arrangements, it now seems appropriate to allow use of this data for sampling and modelling purposes given the increasing population of CSEP Supply Meter Points.

### **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 especially given the increasing % of CSEP Supply Meter Points within the overall mix of Supply Meter Points.

### **Self-Governance Statement:**

We agree with the self-governance status of this modification.

### **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 legal text as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

### **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:**

CSEP Supply Meter Points were excluded from the sampling regime under modification 0440 because of concerns regarding a Transporters ability to access such sites in order to install the necessary equipment. The view at the time that 0440 Legal Text was drafted was that excluding iGT data would not distort the sampling arrangements. Concerns regarding Transporters access to site are allayed as modification 0589S clarifies that Transporters are not required to install any equipment at CSEP Supply Meter Points were this modification to be implemented.

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