

Julian Majdanski  
Joint Office of Gas Transporters  
31 Homer Road  
Solihull  
West Midlands  
B91 3LT

6 February 2008

Dear Julian,

Re: **UNC Modification Proposal 191 – Discontinuance of Code Credit Rules**

Thank you for the opportunity to respond to this Modification Proposal. Northern Gas Networks supports the implementation of this Modification Proposal.

Northern Gas Networks (NGN) agrees that the removal of reference to the now superseded Code Credit Rules within Uniform Network Code (UNC) is appropriate in light of the other recent changes to UNC to incorporate the recommendations contained within the “Best Practice Guidelines for Gas and Electricity Network Operator Credit Cover” 58/05 in February 2005.

Removal of the Code Credit Rules as a separate ancillary document to UNC will remove the possibility of divergence between Transporters in the application of UNC credit related issues. NGN also agrees with the Proposer that removal of the Code Credit Rules will promote greater efficiency in the administration of UNC as all credit related rules are now contained within the UNC. NGN agrees that the production of a separate document to UNC will be merely a duplication of the relevant sections of UNC and that such documentation could potentially add risk of misinterpretation.

NGN further agrees with the Proposer that the ability of Transporters to publish contact details for use by Shippers to discuss credit related issues removes the possibility of communication channels being closed as a result of this Modification Proposal.

NGN agrees with the Proposer that this change can be implemented with immediate effect and that there will be no Transporter costs associated with this.

Yours sincerely,



Joanna Ferguson  
Management Accountant