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8<sup>th</sup> December, 2010.  
Your Reference:UNC Modification Proposal 0342.

**Re: UNC Modification Proposal 0342:**  
**'Amendment to the DN Adjustment Window'**

Dear Bob,

Thank for your invitation seeking representations with respect to the above Modification Proposal.

National Grid Gas Distribution (NGD) would like to offer qualified support for implementation and believes that the proposal for revision of the existing timetable allows more effective use of the time available. National Grid Transmission (NTS) has proposed that the indicative statements for Offtake Capacity and/or indicative Offtake Pressure for 'transitional' and 'enduring' arrangements be provided by no later than 15 Business Days after the Annual Application Window closes. For the transitional period NTS also proposes to give Users more time to resubmit applications (increasing from 5 to 10 Business Days). NTS would continue to have until 30<sup>th</sup> September to agree final applications. For the enduring arrangements, where NTS wholly, or partially, rejects the application the User would have 10 Business Days, following the provision of the indicative statement, to revise its application

Bringing forward the release of the indicative statement also allows more time for DNO Users to re-submit applications and more time for NTS to reconsider them. NGD would have preferred a subtly different timeline such that the final allocations were sent to the DNOs 2 Business Days ahead of the 30<sup>th</sup> September. This would have given the DNOs time to load the final allocations in to their systems and mitigate the risk of any overruns occurring due to an unforeseen error in loading the data.

NGD agrees with the Proposer that implementation of this proposal is consistent with SSC A11.1 (a) " .... the economic and efficient operation of the pipe-line system to which this licence relates" and SSC A11.1 (b) "the coordinated, efficient and economic operation of (i) the combined pipe-line system, and/or (ii) the pipe-line system of one or more other relevant gas transporters". More time in the OCS/OPN process should allow DNO Users and NTS to make better informed decisions and should help facilitate dialogue if required. This potentially ensures that the system is utilised in the most appropriate manner.

Please contact me on 01926 653541 (chris.warner@uk.ngrid.com) should you require any further information.

Yours sincerely,

Chris Warner  
Network Code Manager, Distribution.