

Bob Fletcher  
Joint Office of Gas Transporters  
31 Homer Road  
Solihull  
B91 3LT

7 January 2011

Dear Bob,

**Re: UNC Modification Proposal 0345 – Removal of Daily Metered Voluntary regime**

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) is supportive of this Modification Proposal. Please find below NGNs comments in respect of the Modification Proposal.

With the implementation of Modification Proposal 0224 'Facilitating the use of AMR in the Daily Metered Elective Regime' Users can now provide their own Daily Metering equipment for settlement purposes, known as 'Daily Meter Elective' (DME). This opportunity to compete with the existing Transporter Daily Metered Voluntary (DMV) regime was shipper driven and developed through a thorough and extensive Development Modification which led to the existing phased implementation of the regime.

It is logical that as the new regime is fully implemented that the obligation on Transporters to provide a DMV regime is removed to allow the competitive alternative to operate efficiently and effectively. The removal of the regulated DMV option will provide more incentive for new service providers to enter the DME market in a fully competitive arena thereby providing greater choice to consumers. This will better facilitate relevant objective A11.1 (d) 'the securing of effective competition between shippers'.

As the competitive market for provision of metering information has now expanded, we believe that there should be no requirement for Transporters to have obligations relating to such metering. However, we consider that for larger Supply Points which exert significant load on the network there remains a requirement for the Transporters to be able to access data where required for operational purposes.

Implementation of this Modification Proposal will help incentivise the provision of efficient Daily Metering services through competitive pressures rather than by placing price capped obligations on Transporters to provide the service. In doing so, this will also help facilitate the achievement of relevant objective A11.1 (f) 'Promotion of efficiency in the implementation and administration of the Code'.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,



Joanna Ferguson  
Network Code Manager

