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6th January 2011
Your Reference: UNC Modification Proposal 0344.

Re: UNC Modification Proposal 0344:
'Removal of the D+1 11am meter read liabilities regime for DM voluntary (DMV) Supply Points'

Dear Bob,

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

National Grid Gas Distribution (NGD) would like to offer support for implementation.

We concur with the proposer's view that with the implementation of UNC Modification Proposal 0224 'Facilitating the use of AMR in the Daily Metered Elective Regime' it is appropriate and timely to seek to remove from UNC the Transporter liabilities for Daily Metered 'voluntary' (DMV) read provision, specifically those associated with the provision of a Daily Reading by 11:00 on the Day following the Day to which the relevant Meter Reading relates.

We note that the liabilities payable in accordance with TPD Section M5.2.3 are not in scope of this Modification Proposal.

NGD has undertaken analysis on the consequential effects on its liability exposure arising from implementation of Modification Proposal 0344. The following table illustrates the percentage change in the liability value that NGD would experience as a consequence of implementation based upon liabilities incurred between July 2008 and October 2010. This is based upon the current proportion of NGD DM Supply Meter Points which are within the DMV category and shows that there would only be a marginal reduction in the overall liabilities levied. This is because the M5.2.2 liability applied to NGD in the period indicated above was of low value compared to that incurred under M5.2.3.

	75% DMV
M5.2.3 Monthly Average (97.8% of Total Average)	0.0%
M5.2.2 Monthly Average (2.2% of Total Average)	-75.0%
Total Average	-1.7%

Relevant objectives:

We agree with the views of the Proposer that the measures identified within Modification Proposal 0345 facilitate the GT Licence 'relevant objectives' namely a) and f) as identified within the Draft Modification Report.

We trust that this information will assist in the compilation of the Final Modification Report.

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.