

Bob Fletcher
 Joint Office of Gas Transporters
 Consort House
 6 Homer Road
 Solihull
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9 September 2015

Dear Bob,

Re: UNC Modification Proposal 0552S - UNC Section Y Housekeeping

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

NGN supports this Modification.

Summary of key reasons:

Implementation would clarify and/or correct a number of areas within the UNC Section Y while reflecting changes to the NTS licence and thus further the Relevant Objectives as set out below.

Additional or new issues:

NA

Self-Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

Yes

Relevant Objectives:

NGN considers that this Modification facilitates the relevant objectives as indicated by the proposer. Specifically, NGN considers:

Charging Methodology Relevant Objectives

Condition	Description	NGN view
A5.5(a)	Compliance with the charging methodology results in cost reflective charges	
A5.5(aa)	Insofar as arrangements are established by auction: (i) No reserve price is applied, or (ii) That the reserve is set at a level –	

	<ul style="list-style-type: none"> I. Best calculated to promote efficiency and avoid undue preference II. Best calculated to promote competition 	
A5.5(b)	Takes account of developments in the transportation business	Implementation would reflect changes to National Grid NTS' licence and therefore take account of developments in the transportation business.
A5.5(c)	Facilitates effective competition between gas shippers and suppliers	
A5.5(d)	Reflects alternative arrangements put in place in accordance with a determination made by the Secretary of State	
A5.5(e)	Compliance with legally binding decisions of the European Commission and/or the Agency for Co-operation of Energy Regulators	

Standard Relevant Objectives

Condition	Description	NGN View
A11.1(a)	Efficient and economic operation of the pipe-line system	
A11.1(b)	Efficient and economic operation of the combined pipe-line systems	
A11.1(c)	Efficient discharge of the licensee's obligations	
A11.1(d)	Securing effective competition: <ul style="list-style-type: none"> i) Between shippers ii) Between suppliers iii) Between DN operators and shippers 	
A11.1(e)	Provision of economic incentives for security of supply to domestic customers	
A11.1(f)	Promote efficiency in the implementation and administration of the UNC	Implementation would correct minor errors in the UNC furthering efficiency in its administration.

Impacts and costs:

None

Implementation:

We are satisfied with the standard timescales for a self-governance proposal as outlined in the Draft Modification Report.

Legal text:

Yes

Any further information:

NA

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,



Alex Ross-Shaw
Network Code Officer