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National Gas Emergency Service - 0800 111 999* (24hrs)
*calls will be recorded and may be monitored

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7th January 2016
Your Reference: UNC Modification Proposal 0532

UNC Modification Proposal 0532 - Implementation of Non Effective Days (Project Nexus transitional modification)

Dear Bob,

Thank you for your invitation seeking representation with respect to the above Modification Proposal which, as proposer, National Grid Gas Distribution (NGD) would like to offer support.

Do you support or oppose implementation?

Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition:

The 'transitional' measures identified within the Modification Proposal are essential to facilitate implementation of the UK-Link replacement programme on 1st October 2016.

Are there any new or additional issues that you believe should be recorded in the Modification Report:

We have not identified any new or additional issues.

Self Governance Statement:

We agree that the Modification Proposal should not be subject to self-governance procedures given its material effect on gas consumers.

Relevant Objectives:

Relevant Objective: d) Securing of effective competition:

We note the comments in the Draft Modification Report which identifies that this Modification could have a minor negative effect on competition. This reflects that the overall Supply Point transfer timescales could be longer given the need for Non Effective Days as identified in the Modification. While this is an unavoidable consequence of the implementation of the Project Nexus programme, we strongly concur with the statement identifying the need for this to be taken in context with the positive impacts identified as a consequence of implementation of Project Nexus related UNC Modifications 0432, 0434 and 0440.

Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code:

NGD concurs with the comment in the Draft Modification Report concerning facilitation of the above relevant objective.

Impacts and Costs:

We agree with the statement in the Draft Modification Report concerning the funding of this Modification Proposal and we have no further comment in this respect.

Implementation:

This Modification can be implemented with immediate effect upon direction by the Authority.

Legal Text:

NGD is satisfied that the drafting and text commentary as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

Is there anything further you wish to be taken into account?

We have not identified any further issues.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 653541 should you require any further information.

Yours sincerely,

Chris Warner
Stakeholder Implementation Manager, Distribution