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11th January 2016
Your Reference:UNC Modification Proposal 0566S

UNC Modification Proposal 0566S – UNC modification stakeholder engagement and Guidelines

Dear Bob,

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

Do you support or oppose implementation?

Support

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

We believe that encouraging greater stakeholder engagement prior to the raising of modifications can only be to the benefit of the industry. In addition, the clarifying of timescales which allow 3 days for the Joint Office to carry out its critical friend activities and clarification of Panel powers regarding requesting further development prior to next step decisions will also be beneficial in aiding better developed modifications to progress in an efficient manner.

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

We have not identified any such issues.

Self Governance Statement:

We agree that the Modification Proposal should be subject to self-governance procedures given there is no material impact on gas consumers.

Relevant Objectives:

f) Promotion of efficiency in the implementation and administration of the Code.

NGD concurs with the comments in the Draft Modification Report concerning the facilitation of these relevant objectives.

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:

We are in agreement with the implementation timescales identified within this Modification Proposal.

Legal Text:

NGD is satisfied that the drafting 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 or concerns.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 655299 (andy.clasper@nationalgrid.com) should you require any further information.

Yours sincerely,

Andy Clasper
National Grid Distribution