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

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10<sup>th</sup> September 2014  
Your Reference: UNC Modification Proposal 0497

UNC Modification Proposal 0497 – Removal of the CSEP NExA table held within Annex A part 8

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Urgent Modification Proposal for which National Grid Gas Distribution (NGD) as proposer 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 note that the scope of this Modification Proposal has changed since the original version and in particular that it no longer contains a proposal to modify the iGT Arrangements Document (iGTAD) which is identified within UNC Modification Proposal 0440 'Project Nexus – iGT Single Service Provision'. Given this reduced scope, we believe the Proposal is now capable of being implemented and are able to offer support.

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

We have not identified any additional issues.

**Self Governance Statement:**

We agree that this Modification Proposal should not be subject to self-governance procedures given that it is likely to have material effect on competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

## **Relevant Objectives:**

Relevant objective f) Implementation and Administration of the Code

We concur with the statement in the Draft Modification Report that "Implementation of this change will improve the efficiency of the implementation and administration of the code".

## **Impacts and Costs:**

There are no costs associated with implementation of this Modification Proposal.

## **Implementation:**

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

## **Legal Text:**

Legal Text is not required as a consequence of implementing this Modification Proposal. However, we note that changes would be required to the LDZ CSEP NExA and these have been identified and provided to the Joint Office.

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

We support this Modification Proposal on the basis that on balance it is a logical step in ensuring consistency of Annual Quantity (AQ) values identified within the iGT UNC to those applied under iGT/Large Transporter settlement arrangements within the LDZ CSEP NExA. However, under the reasonable assumption that UNC Modification Proposal 0440 will be approved by Ofgem and implemented in October 2015, we see relatively limited benefit arising from implementing this Modification Proposal given that the LDZ CSEP NExA will be eliminated by Proposal 0440.

We note that under the assumption that Modification 0440 were implemented, if the arrangements concerning alignment of AQ values as identified within this Modification Proposal were required to be enduring, modification of the proposed iGTAD document would be necessary. However we understand why it would be inappropriate to bring forward such a proposal at this stage given that an Authority decision on 0440 is not presently forthcoming.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 653541 ([chris.warner@nationalgrid.com](mailto:chris.warner@nationalgrid.com)) should you require any further information.

Yours sincerely,

Chris Warner  
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