

Bob Fletcher
Joint Office of Gas Transporters
31 Homer Road
Solihull
B91 3LT

9 December 2014

Dear Bob,

Re: UNC Modification Proposal 0469S - Transporter Gas Safety Visit Reporting

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 NGN's comments in respect of the Modification Proposal.

NGN supports this Modification proposal.

Summary of key reasons:

Although the GS(I&U)R visits are undertaken by DNs to fulfil Supplier obligations and are not provided for in the UNC we are supportive of efforts to improve the transparency of the process. This will help provide surety to Suppliers that the process is working as it should and is not increasing the risk of unregistered gas being offtaken from the network.

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:

How would implementation of this modification impact the 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:	

	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	We believe implementation would further this Relevant Objective.

Impact and costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

If implemented Transporters would face additional costs in the publication of the reports.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

We are satisfied with the lead-time outlined in the modification.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

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