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10 June 2016  
Your Reference:UNC Modification Proposal 0580S

UNC Modification Proposal 0580S – Implementation of Non Effective Days to enable Annual AQ Review (independent of Nexus transition)

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:**

The Non Effective days are required to process the large quantities of data necessary to manage the 2016 Annual AQ review in much the same way as Modification 0535 which was implemented in 2015 to facilitate the 2015 Annual AQ review.

**Self Governance Statement:**

We agree that this Modification Proposal should not be subject to self-governance procedures because it may have a material impact on existing and new gas consumers and competition due to the required number of Non Effective Days.

**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 this 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:**

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

### **Legal Text:**

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

### **Modification Panel Members have requested that the following questions are addressed:**

*Q1: Please provide clear views and supporting evidence on the self-governance status of this modification focusing, in particular, on whether this proposal is likely to have a material impact upon competition in the shipping, transportation or supply of gas.*

As stated above we believe that this Modification Proposal should not be self-governance as the number of Non Effective days required could have a material impact on existing and new gas consumers and competition.

*Q2. Views are invited on the number of non-effective days you think are appropriate. Please include justification for your view.*

Shipper Users at Distribution Workgroup indicated that 7 Non Effective days would be preferable to 4 as this would align with the number of Non Effective dates proposed within Modification 0532 and would therefore provide certainty. We believe this to be a pragmatic approach.

### **Views on errors or omissions in the Modification Report which should be taken into account:**

We have not identified any such errors or omissions.

### **Additional analysis or information to support your representation:**

We have nothing further to add.

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](mailto:andy.clasper@nationalgrid.com)) should you require any further information.

Yours sincerely,

Andy Clasper  
National Grid Distribution