

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

10 December 2013

Dear Bob,

Re: UNC Modification Proposal 0431: Shipper/Transporter - Meter Point Portfolio Reconciliation

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:

If implemented this proposal will reduce the number of unregistered sites on the Network, and therefore lead to more accurate costs allocations for Shippers. We look forward to working with shippers and suppliers to resolve any differences between the two sets of records.

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?

NA

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	Implementation would lead to fewer unregistered sites and consequently more accurate costs, furthering effective

		competition.
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	
A11.1(g)	Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-Operation of Energy Regulators	

Impact and costs:

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

NA

Implementation:

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

We support the implementation lead-times outlined in the proposal.

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