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12th December 2013
Your Reference:UNC Modification Proposal 0431

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

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.

NGD, along with the other Distribution Networks have undertaken a variety of measures aimed at reducing the number of Shipperless and Unregistered sites on the Supply Point Register. Implementation of this Modification is a further initiative which we would expect to further reduce the number of Shipperless and Unregistered meter points.

Analysis of the recent Xoserve 1000 site letter trial showed that 15.8% of the 1000 chosen sites were removed at the request of Shippers and of these 73 were later confirmed and 9 set to DE/EX; approximately 8% of the initial 1000 sites. A similar success rate across the existing portfolio of Shipperless and Unregistered sites could therefore lead to a reduction of circa 7200.

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

We have not identified any such issues.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Standard Special Condition A11.1 (c): Efficient discharge of the Licensee's obligations.

NGD believes there may be a link to Standard Condition 7 in that this Modification may decrease the population of Shipperless and Unregistered sites which could require investigation following evidence being provided that gas may be being used.

However we do not agree with the link that has been made to Standard Condition 31. Standard Condition 31 requires a Transporter to operate and maintain a Supply Point Register but does not state this is for the purposes of resolving unidentified gas.

Standard Special Condition A11.1 (d): Securing of effective competition

NGD concurs that effective competition would be facilitated by correct allocation of costs as a result of reducing incidences of unidentified gas due as a result of Shipperless and Unregistered sites.

Impacts and Costs:

We believe there would be minimal impacts and costs borne by Transporters (Xoserve) as a consequence of the Modification being implemented.

Implementation:

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

We agree with the implementation timescale proposals identified within the Draft Modification Report.

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?

No further matters have been identified.

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
Network Code
National Grid Distribution