

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

20 March 2014

Dear Bob,

**Re: UNC Modification Proposal 0455S: Updating of Meter Information by the Transporter**

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:**

By allowing Transporters to update the Meter Information on a Supply Point where the Registered User or previously Registered User has failed to do so it will ensure that the Supply Point Register is maintained to the highest possible accuracy, which will facilitate effective competition through the efficient operation of numerous UNC processes.

The levy of a small charge whenever an update occurs in this manner will also incentivise Users to ensure that the information is maintained appropriately.

**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:	Positive – An accurate Supply

	i) Between shippers ii) Between suppliers iii) Between DN operators and shippers	Point Register aids the efficient operation of numerous UNC processes including NDM Allocation, AQ calculation and Individual Meter Point Reconciliation. This will further secure 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?*

None

**Implementation:**

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

We are satisfied with the lead-time set out in the Modification Proposal.

**Legal Text:**

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

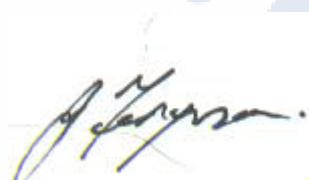
Yes

**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,



Joanna Ferguson  
Network Code Manager