

Joint Office

Enquiries@gasgovernance.co.uk

05 March 2019

Dear Joint Office,

Re: UNC Modification Proposal 0652 – Introduction of Winter Read/Consumption Report and Associated Obligations

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this Modification.

NGN supports this Modification proposal.

Reasons for Support/Opposition:

We agree that this modification should improve the accuracy of demand estimation by placing an obligation on Shippers to take all reasonable steps to ensure that accurate Winter Consumption Data is provided within key consumption calculation months, with the intention of preventing default Winter Annual Ratio (WAR) Bands from being assigned. As per the UIG Task force findings, this modification should also aid in a slight reduction in UIG

Implementation:

What lead-time do you wish to see prior to implementation and why?

We agree that this modification could be implemented as soon as Authority approval is received, with the aim that this should allow the CDSP to create the reports in time for the Winter 2019/20 cycle

Impact and costs:

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

We have not identified any direct costs or impacts to NGN as a result of this modification.

Legal Text:

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

Yes, we agree that the legal text provided will deliver the Solution outlined in the modification.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that this modification would further Relevant Objective d) The Securing of Effective Competition as improvements to demand estimation will have a positive effect on Non-Daily Metered (NDM) nominations and allocations, furthering competition between Shippers and Suppliers

Are there any errors or omissions in the Modification Report?

None identified.

Smell gas?

Call the National Gas Emergency
Service on 0800 111 999

a 1100 Century Way
Thorpe Park Business Park
Colton, Leeds LS15 8TU

t 0113 397 5300
w northerngasnetworks.co.uk

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the network**

Any additional analysis or comments?

None.

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,

Shanna Key (via email)
Industry Codes Officer

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