

Joint Office
Enquiries@gasgovernance.co.uk

30 April 2019

Dear Sir or Madam,

Re: 0685 - Amendment of the UNC term 'Gas Deficit Warning' to 'Gas Balancing Notification'

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 change.

NGN supports this Modification proposal.

Reasons for Support/Opposition:

We support this modification because it seeks to amend the name of the notice to a more reflective one, reducing the likelihood of misinformation to end customers, in the event of it being issued.

There is also a typographical amendment, the correction of which does not change the meaning or intent of the code.

Self-Governance Statement:

Please provide your views on the self-governance statement.

We agree that this modification should be sent for Authority Direction, this is due to the name of the notice potentially leading to confusion for consumers.

It is also noted that the name appears in the National Grid Licence, therefore the Authority will need to coordinate and facilitate the Licence amendment.

Implementation:

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

We support the proposed implementation date of 1 October 2019; however, we are aware of the requirement for the Licence change and would prefer both changes to be in alignment.

Impact and costs:

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

None identified.

Legal Text:

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

We agree that the legal text provided should deliver the solution set out in the modification.

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Service on 0800 111 999



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Thorpe Park Business Park
Colton, Leeds LS15 8TU



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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe that this modification would further both Relevant Objectives a) and e):

a) *Efficient and economic operation of the pipe-line system* should be furthered as a more accurate name for the notification should provide clarity regarding the status of the gas system during gas events.

e) *Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards...are satisfied as respects the availability of gas to their domestic customers* should be furthered as clearer naming of the notice should result in a better understanding of impact, and therefore, the need for suppliers to make provision for peak demand days.

Are there any errors or omissions in the Modification Report?

On page 9, Relevant Objective 'e)' is incorrectly labelled as 'd)' in the Relevant Objectives justification.

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,

Tracey Saunders (via email)

Northern Gas Networks
Market Services Manager (Industry Codes)
07580 215 743

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