

Bob Fletcher  
Joint Office of Gas Transporters  
31 Homer Road  
Solihull  
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30 March 2012

Dear Bob,

**Re: UNC Modification Proposal 0397S - Amendments to Section I of the OAD to reflect Offtake Profile Notice rules & recognition of different NTS/LDZ Offtake sensitivities**

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:**

NGN are fully supportive of this Modification Proposal and agree with the reasoning set out in the Draft Modification Report.

This Modification Proposal seeks to change four areas of offtake flows, it would change from a 'one size fits all' treatment of LDZ Offtakes to a Designates or Non-Designates basis, relax the frequency in which a DNO can submit a revised Offtake Profile Notice, remove the requirement to specify a reason for a flow swap request and extend the area for a DNO flow swap from the NTS Exist Zone to LDZ Level.

Implementation of this Modification Proposal will enable GDNs to focus our efforts on predicting and managing flows through LDZ sites. The removal of the requirement to specify a reason for a flow swap request will not impinge on whether National Grid NTS can still provide the service and it is sensible that both requests from National Grid NTS and the DNOs can relate to the same LDZ level without DNOs being restricted to the NTS Exit Zone.

**Additional or new issues:**

N/A

**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	The efficiency of networks is improved by allowing flows to be transferred between Offtakes within the LDZ at the request of either Transporter.
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	
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	Using individual Supplemental Agreements to reflect specific tolerances for Designated Offtakes allows for changes to be made without having to raise a UNC Modification to alter the OAD on every occasion.

**Impact and costs:**

NGN are satisfied with the impact and costs as outlined in the Draft Modification Report.

**Implementation:**

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

As self-governance procedures are proposed, implementation could be 16 business days after a Modification Panel decision to implement.

**Legal Text:**

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

Yes.

**Any further information:**

N/A

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  
Network Code Officer