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7<sup>th</sup> September, 2012

Your Reference: UNC Modification Proposal 0420.

Re: UNC Modification Proposal 0420: New Connections Interruptible Loads.

Dear Bob,

Thank you for your invitation seeking representation with respect to the above Modification Proposal, which National Grid Gas Distribution (“NGD”) would like to support.

**Do you support or oppose implementation?**

Support.

**Please summarise the key reason(s) for your support.**

We note that the principles detailed in this proposal were first established during the development work undertaken for Modification Proposal 0090 (Revised DN Interruption Arrangements), (“Mod 90”). At the time, it was agreed that there should be a mechanism to allow new loads to connect to the network on interruptible terms as an expedient measure to allow the customer to consume gas in advance of the network reinforcement necessary to supply the customer on a firm basis. We believe that the principle remains valid and agree that this proposal facilitates the early connection of supply points to the network, as envisaged by Mod 90, and should be implemented.

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

No.

**Relevant Objectives:**

Implementation would allow new supply points to connect to the system on default interruptible terms. Allowing these customers, together with other customers on the constrained network to then participate in subsequent interruption auctions would ensure that investment in reinforcement is only carried out where there is no commercial alternative. Such a mechanism should present the most economic way of developing the network while best meeting customer requirements. Consequently, we agree that implementation of the modification would further relevant objective relating to economic and efficient development of the network.

**Impacts and Costs:**

Transporters can implement this proposal with some minor changes to operational processes.

**Implementation:**

Our view is that implementation could be effected shortly after an Authority decision.

**Legal Text:**

NGD is satisfied that the suggested text, 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.

We trust that this information will assist in the compilation of the Final Modification Report.

Please contact me on 01926 653559 ([alan.raper@nationalgrid.com](mailto:alan.raper@nationalgrid.com)) should you require any further information.

Yours sincerely,

Alan Raper  
Regulatory Contracts Manager  
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