

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

20 March 2014

Dear Bob,

Re: UNC Modification Proposal 0440 - Project Nexus – iGT Single Service Provision

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:

Implementation of this proposal would allow Single Service Provision between Transporters and Independent Gas Transporters, creating a range of cost efficiencies and process improvements.

This would further secure effective competition and efficiencies in the administration of the code.

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?

NA

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: i) Between shippers ii) Between suppliers iii) Between DN operators and shippers	Positive – Implementation would lead to more accurate and more frequently refreshed data, which would ensure

		accurate cost allocation, securing 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	Positive – By creating a Single Service Provision it will provide a common approach to managing allocations, settlement and reconciliation processes thereby promoting efficiency in the 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?

The costs associated with this proposal are included within the Project Nexus budget.

Implementation:

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

We are satisfied with the proposal that implementation would take place on the Project Nexus Go-Live date.

Legal Text:

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

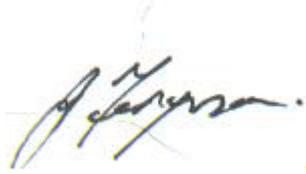
Yes

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