



Hinckley Operational Centre
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Leics
LE10 0NA

National Gas Emergency Service - 0800 111 999* (24hrs)
*calls will be recorded and may be monitored

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10 June 2016
Your Reference:UNC Modification Proposal 0526S

UNC Modification Proposal 0526S – Identification of Supply Meter Point pressure tier

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal for which National Grid Gas Distribution (NGD) does not support.

Do you support or oppose implementation?

Do not support

Please summarise (in one paragraph) the key reason(s) for your support/opposition:

NGD, along with the other Transporters has worked closely with the proposer to develop a process which would provide Shippers, Suppliers and Meter Asset Managers (MAMs) with adequate pressure tier data to mitigate the risks outlined by the proposer, namely time consuming GT1 processes and abortive site visits. However we do not believe the provision of pressure tier data is a UNC matter and consequently we feel it is inappropriate to include such provisions in the Code which are more properly dealt with through other routes.

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

We would draw attention to the position that parties which would predominantly make use of pressure tier data would be Suppliers and MAMs. Consequently in this case it is clear in our opinion that the Supply Point Administrative Agreement (SPAA) would be a more appropriate governance framework.

Self Governance Statement:

We agree that this Modification Proposal should be subject to self-governance procedures.

Relevant Objectives:

- d) Securing of effective competition:
 - (i) between relevant shippers;
 - (ii) between relevant suppliers; and/or
 - (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

We have observed that the Proposer and workgroup attendees had some difficulty in identifying which Relevant Objective was appropriate. We do not believe that this Modification Proposal furthers Relevant Objective d)

It is also our view that the Modification Proposal has an adverse impact on Relevant Objective f) We believe it is inappropriate to include provisions within code which are not relevant UNC issues and which are better dealt with through other codes in this case the SPAA.

Impacts and Costs:

There would be ongoing costs to NGD in providing the required information on a quarterly basis.

Implementation:

This Modification Proposal can be implemented 16 days after determination by the UNC Modification Panel.

Legal Text:

NGD is satisfied that the legal text as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

Views on the impacts to SPAA parties:

We believe that the parties having a principal interest in receiving pressure tier data are Suppliers and MAMs. Whilst Transporters have agreed to provide this information (via our Agency Xoserve) on a voluntary basis, if the proposer believes that further governance is required to ensure the ongoing provision of the data then a SPAA change would be required. The UNC Modification, should it be directed for implementation, would only enable access to Shipper Users.

Views on errors or omissions in the Modification Report which should be taken into account:

We have not identified any such errors or omissions.

Is there anything further you wish to be taken into account?

As described above we believe it inappropriate to include provisions within code which are not relevant UNC issues and which are better dealt with through alternative governance. NGD and the other Transporters have maintained that they are prepared to work with Shippers and MAMs in order to develop appropriate solutions but that this is not a matter for the UNC. Indeed the required solution was developed and the required pressure tier data provided to Xoserve for onward dissemination to Shippers, Suppliers and MAMs prior to completion of the Workgroup Report for this modification. We have indicated that this service would continue irrespective whether it is incorporated in UNC or otherwise.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 655299 (andy.clasper@nationalgrid.com) should you require any further information.

Yours sincerely,

Andy Clasper
National Grid Distribution