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UNC Modification Proposal 0038  
Provision of Information to Support Development of the NTS Investment Programme

Dear Julian,

Thank you for your invitation seeking representation with respect to the above Modification Proposal.

In summary, Transco Distribution is in favour of Modification Proposal 0038, as the proposal seeks to provide a two way flow of information between Transco NTS and DNO Users to assist the transporters in making the most efficient and economic investment decisions.

Transco Distribution recognises the need for short implementation timescales and whilst we support the Modification Proposal for implementation at this time we feel that the Proposal does raise some concerns that would benefit from review over a longer time period.

1. The first is the issue of the provision and timing of CV data and it is recognised that this issue will be discussed as part of the wider discussion on the planning process scheduled to take place at the Operator Arrangements Workstream. This is an important issue as the data is critical in informing investment decisions to be made in our distribution networks.
2. The second issue concerns whether it is still appropriate for data to be supplied for Day 13 of the severe load duration curve. Historically, this day on the load duration curve has been important because it is the point when LNG storage would first be required for peak shaving. Going forward, with the changing supply/demand patterns and use of LNG in the UK the Day13 data may not always provide Transco NTS with the information they require for their investment decisions.

We hope you find these comments helpful. Please contact Mark Freeman on 01926 656218 (mark.freeman@ngt.uk.com) should you require any further information.

Yours sincerely

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