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National Gas Emergency Service - 0800 111 999\* (24hrs)

\*calls will be recorded and may be monitored

Julian Majdanski Secretary Modification Panel Joint Office Matt Golding Commercial Manager

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Dear Julian,

## Re: UNC Modification Proposal 0060 "Publication of Information in the Maintenance Programme"

National Grid NTS supports the aims of this Proposal. However we believe that the proposed legal text could be misinterpreted and suggest that the alternative text, provided below, gives greater clarity.

The UNC places a requirement on National Grid NTS to publish a Maintenance Programme that identifies maintenance affected connections and the periods for which it is expected that they will be affected. However, due to confidentiality requirements, specific information relating to NTS System Exit Points has not historically been published. The proposal that information on affected NTS Connected System Exit Points and NTS Supply Points be made available to the relevant shipper(s) and consumer at these points at the same time as publication of the Maintenance Programme is a pragmatic approach to ensuring that consumers receive early information relating to possible disruption to their gas supplies whilst maintaining commercial confidentiality. The information to be provided should be consistent with the requirements for the Maintenance Programme specified in TPD Section L 3.2.1. This may, in some cases, mean that precise dates are provided; whilst for other cases only a "window" (of typically two weeks) can be provided. In the latter case, precise dates are confirmed in accordance with the further provisions of UNC.

National Grid NTS believes that the proposal would better facilitate the relevant objectives by increasing the efficient and economic operation of the pipeline system. This will be achieved through improved co-ordination of the planned activities of the consumer and National Grid NTS leading to a reduced need for works to be rescheduled.

The proposal, if implemented, will have a minor resource impact on National Grid NTS to produce the additional maintenance notices.

National Grid NTS believes that the proposed legal text could be misinterpreted as requiring **all** the information required under clause 3.2.1 to be provided to Maintenance Relevant Parties, rather than site specific information to be provided to the appropriate Maintenance Relevant Parties. We believe that the following text (amended from that proposed) better meets the intention of the proposal.

## **SECTION L - MAINTENANCE AND OPERATIONAL PLANNING**

3.2.2 Without prejudice to paragraph 3.4.1, tThe information specified in paragraph 3.2.1 will be identified for NTS Supply Points, NTS Connected System Exit Points and NTS System Entry Points individually and will only be provided to the relevant Maintenance Relevant Party at each, with all information on NTS Connected System Exit Points and NTS Supply Points being provided directly only to the Maintenance Relevant Parties to ensure commercial confidentiality.

Yours sincerely

Matt Golding Commercial Manager