



**Comments in respect of
Modification 0066: Programmed Maintenance Notice Periods at NTS
System Exit Points**

16 December 2005

The Association of Electricity Producers welcomes the opportunity to comment on this modification proposal. The Association offers its full support for this proposal.

We also appreciate National Grid's willingness to engage in dialogue with the Association and its Members on these issues and the proposals that it brought forward and shared with the industry to address the concerns raised.

Facilitation of the Relevant Objectives

The Association considers that the proposed improvements to the notice periods for planned maintenance and provision of planned maintenance will further the relevant objectives.

The efficient and economic operation of the pipe-line system may be enhanced by better coordination of pipeline and plant maintenance which could lead to higher utilisation of the pipeline system than would be the case if maintenance could not be aligned as may be the case if this proposal is not implemented and poor information provision and short notice periods persist.

Avoiding undue preferential or discriminatory arrangements. The provision of additional information concerning online inspection programmes to all affected parties will further the facilitation of this objective. Absent this proposal some parties may have gleaned information from National Grid concerning online inspection programmes that may not have been available to all the parties that may be affected by such programmes. As online inspection programmes are typically accompanied by prolonged periods when no gas may be offtaken, parties with this information may obtain a commercial advantage over parties similarly affected but without access to the information.

Securing of efficient competition. This will be secured by ensuring that affected parties have access to the same information concerning planned maintenance and on line inspection programmes.

Legal Text

Legal text has not been provided so we are unable to comment

Implications of implementation on Users and consumers

This proposal if implemented would provide for early dialogue with National Grid concerning prolonged periods of maintenance that may enable pipeline and plant maintenance to be aligned to the benefit of all parties. The provision of a longer notice period will also allow shippers and consumers more time to manage their gas, and in the case of CCGTs electricity, market exposure.

Advantages of the Proposal

We agree with the advantages listed in the draft modification report, namely; alignment of maintenance, management of commercial positions and improved co-ordination.

Disadvantages of the Proposal

We cannot identify any disadvantages associated with this proposal.