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Dear Julian,

UNC Modification Proposal 0100: 'Amendment to OPN/SFN Submission Times'

Thank you for your invitation seeking representations with respect to the above Modification Proposals.

National Grid Gas plc (UK Distribution), ("Distribution") does not support the implementation of Modification Proposal 0100.

While our representation does not support implementation, we do have some sympathy with the underlying objective of the proposal. Given National Grid NTS has an obligation to provide Total System forecast demand by 14:00 (D-1), it is appropriate that they should have at their disposal the best demand information available from both Distribution Network Operators ("DNOs") and Direct Connected Supply Points ("direct connects") to compile that figure.

Our principle objection to implementation is that we believe the existing DNO arrangements work optimally. DN Control Centre ("DNCC") obtain weather forecast data from the Met Office nominally no later than 12:00 and forward the derived individual LDZ demand forecasts by 13:00 which is then incorporated into the 14:00 Total System demand forecast. We believe an additional requirement for DN Operators to pass Offtake Profile Notifications ("OPNs") to NTS earlier, which are not required for demand forecasting purposes, would degrade the accuracy of Total System demand forecast and increase costs. Supplying LDZ demand forecasts and OPNs in sufficient time to meet a 12.30 deadline would require additional time to process the raw weather data, which would require it to be obtained from the Met Office sooner. We believe this would increase the likelihood of the weather forecast data not reflecting the actual weather patterns on gas day D, thereby degrading the accuracy of the Total System demand forecast.

In terms of the proposed DNO OPN requirement, it seems that it has been included simply to place non-discriminatory obligations on both direct connects and DNOs. A more pragmatic solution could have been to extend the current obligation on DNOs to submit day-ahead forecast demand information to NTS in time for the 14:00 Total System forecast demand forecast on to direct connects. It is conceivable that the direct connect demand forecast could be submitted in the form of an OPN if that was the most convenient format to transmit the information.

In summary, notwithstanding the above observation in relation to direct connects, from a DN perspective we believe the current arrangements are operating optimally, and consequently implementation would *not* result in a more “*economic and efficient operation of the pipeline system*”

For these reasons, Distribution opposes the implementation of Modification Proposal 0100.

Yours sincerely,

Phil Lawton.