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1 October 2007  
Your Reference 0173

**Re: Modification Proposal 0173: 'Obligations to process data received from iGTs in line with requirements within Annex A of the CSEP NExA'**

Dear Julian,

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

Consistent with our representation submitted in respect of UNC Modification 0083, National Grid Distribution supports implementation of this proposal which seeks to rectify a number of issues identified in respect of the legal text provided for the aforementioned Modification.

We concur that the legal text applied as a consequence of the implementation of Modification 0083 did not reflect the full nature and intention of the Proposal, a point to which we referred in our original representation. We note that the proposer has included suggested legal text with its proposal which appears to rectify the aforementioned errors (though we would recommend removal of the "]" at the end of the definition of "validate").

As the proposal seeks to implement the full extent of Modification 0083 as envisaged by its proposer we believe that the proposal facilitates the securing of effective competition between relevant shippers by clarifying the level of validation applied to the relevant data provided by iGTs and the manner in which such receipt is managed by Distribution Networks.

We trust these comments will be useful for compilation of the Final Modification Report.

Please contact Chris Warner on 01926 653541 ([chris.warner@uk.ngrid.com](mailto:chris.warner@uk.ngrid.com)) should you require any further information with respect to the above.

Yours sincerely

Phil Lawton  
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