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Your Reference 0191

**Re: Modification Proposal 0191 'Discontinuance of Code Credit Rules'**

Dear Julian,

Thank you for your invitation seeking representations with respect to the above UNC Modification Proposal. National Grid Distribution (NGD) supports its implementation.

As the substantive rules for Credit Cover arrangements in respect of Transportation charges are now detailed within the UNC, we agree that the requirement for a distinct Code Credit Rules document is negated. One of the key advantages for incorporating rules into the UNC is to ensure that all Transporters are required to apply one consistent 'Best Practice' policy and thus to maintain Transporter specific Code Credit Rules documents may lead to confusion regarding the applicable rules.

Nonetheless, in the event of implementation NGD is considering the establishment of a 'User Guide' type document for its customers that would aim to provide an interpretation of the UNC provisions in layman's terms which we believe would be of particular use for new market entrants. If pursued, this document would sit entirely outside of the UNC.

We agree with the proposer's assessment that this Modification Proposal would facilitate the securing of effective competition between relevant shippers by removing the potential for divergence between the UNC and Code Credit Rules and additionally facilitate the promotion of efficiency in the implementation and administration of the UNC.

We trust these comments are 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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