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Your Reference: 0192

Re: Modification Proposal 0192: “Introduction of DNO obligations to facilitate resolution of unresolved USRVs”.

Dear Julian,

Thank you for your invitation seeking representations with respect to the above Modification Proposal. As the proposer, National Grid Gas (Distribution) (NGD) supports implementation.

Review Group 0158 “Review of Suppressed Reconciliation Values” concluded that it would be prudent to introduce a new mechanism to help to ensure that User Suppressed Reconciliation Values (USRVs) should not be “timed out” following the implementation of Modification 0152V. Distribution Network Operators agreed that it may be appropriate for them to administer this backstop mechanism as a User Pays service and to employ the services of their agent xoserve, to administer this arrangement. Subsequently NGD raised this Modification Proposal which was developed within the Distribution Workstream where it was discussed on several occasions.

NGD believes that this Proposal has benefited considerably from development and amendments to the Proposal were the result of constructive ideas put forward within the workstream. NGD therefore believes that an optimum solution has been struck e.g. the time period of thirty months, before the backstop mechanism is reached, allows time for User resolution of the USRV where the User has sufficient information and knowledge. It also allows sufficient time for the backstop mechanism to work before elements of the reconciliation period in question become timed out for invoicing purposes (0152V).

NGD agrees with the information contained within the Draft Modification Report, specifically the comments made in relation to the better facilitation of the Relevant Objectives and the advantages that the Proposal offers.

If you require any further information in respect of this representation please contact Alison Chamberlain on 01926 653994 or email alison.chamberlain@uk.ngrid.com.

Yours sincerely

Richard Court
Customer Contracts & Regulation Manager