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Mr John Bradley

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## <u>UNC Modification Proposal 0239 –</u> <u>"Reinstatement of NTS Interruption"</u>

Dear John,

Thank you for your invitation seeking representation with respect to the above Modification Proposal. National Grid NTS, as proposer of the modification, supports implementation on the basis that it better facilitates the relevant objectives as discussed below.

## Standard Special Condition A11.1 (a): the efficient and economic operation of the pipe-line system to which this licence relates;

Implementation of this proposal would permit National Grid NTS to continue to access NTS Interruptible load after the transition date of 1 October 2011. Utilisation of NTS Interruption could be reasonably expected to have a lower cost than either constructing additional transportation capacity or using other operational tools that were not intended for the same purpose, and hence implementation would better facilitate this objective.

## Standard Special Condition A11.1 (c): the efficient discharge of the licensee's obligations under this licence;

Constructing sufficient additional transportation capacity to meet the forecast 1:20 Peak day demand for the 2011/12 winter without NTS Interruption would be very challenging, and hence implementation of this proposal would better facilitate this objective by permitting National Grid NTS to meet its licence obligations in the most efficient way.

Please let me know if you require any further information to enable preparation of the Final Modification Report.

Yours sincerely,

Adam Sims Commercial Analyst