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9th April, 2009.

Your Reference: Modification Proposal 0247.

Re: Modification Proposal 0247: 'Alignment Of Interruption Application Rules for Annual and Ah-Hoc Applications'

Dear John,

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

National Grid Gas plc (Distribution) (NGD) would like to offer support for this proposal which would allow Distribution Networks to seek bids from Users during the routine Annual Interruption Invitation for years one to eight. This would remove the routine requirement to seek bids for years one to three in a separate Ad-Hoc Application Window, reducing administration and consequential risks. Currently it is possible that the success of the routine application window may be conditional on the success of the Ad-Hoc process e.g. interruption could be secured for years four onward with no guarantee that it can be secured for year three if it is required, which could cause a need for short term reinforcement. The Ad-Hoc process would remain for bids for any year.

NGD agrees with the points put forward in the Draft Modification Report in relation to the better facilitation of the relevant objectives, specifically in relation to SSC A11.1(a) the economic and efficient operation of the pipeline system to which this licence relates. NGD believes that removal of the conditionality that can be caused by the current processes, may avoid the need for short term reinforcement requirements. NGD also believes that SSC A11.1(f) the promotion of efficiency in the implementation and administration of the network code would be achieved through the removal of the requirement to routinely hold two application processes.

Please contact Alison Chamberlain on 01926 653994 (alison.chamberlain@uk.ngrid.com) should you require any further information with respect to the above.

Yours sincerely,

Richard Court
Commercial Manager, Distribution.