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10th August 2009.

Your Reference: Modification Proposal 0253.

Re: Modification Proposal 0253 'Facilitating a Supply Point Enquiry Service for Large Supply Points'.

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 in respect of this. The Proposal seeks to amend the Uniform Network Code (UNC) to allow the Transporter to release information (equivalent in scope to that issued pursuant to a Supply Point Enquiry) to Users in the form of a report (upon request by such a User). In practice this report would be provided on a 'User Pays: Non-Code Service' basis by the Transporter Agency and would contain all of the information that is available to Users under the current Supply Point Enquiry process in respect of all Larger Supply Points.

NGD recognises that the Supply Point Enquiry provides information to a User which is necessary to enable it to make an assessment of the costs to which it would be subject if it were to become the Registered User of a Supply Point. In doing so, this service clearly facilitates competition between relevant Shippers and Suppliers. Therefore, facilitating the provision of a service which provides for efficient conveyance of information which can already be obtained by submitting a Supply Point Enquiry would appear to further enhance the facilitation of Standard Special Condition A11(1)(d) of the Transporters Licence (the securing of effective competition between relevant Shippers).

Information currently released by Transporters pursuant to a Supply Point Enquiry is classified as Protected Information under TPD Section V5.3 and the Transporters' entitlement to disclose such information is specified within TPD V5.5.2(d) which permits its disclosure where required to do so under the UNC. Therefore in order to ensure that the Transporters' entitlement to release the Protected information under TPD V5.5.2(d) would be effective, it is important that the proposal is clear that TPD G1.17 would provide for the disclosure of information to the Transporter Agency to enable them to produce a report for Users as a non Code Service. We understand that this is the intent of the proposal.

It is worthy of note that (under TPD V5.2.1(b) each User is obliged to secure that Protected Information is not used by such User for any purpose other than one expressly contemplated by the Code. Therefore we believe the Proposal should state for what *purpose* the information obtained by the User (via the proposed report service) would be utilised by that User and that this be reflected within TPD G1.17. We note that on 3rd August 2009, in response to Distribution Workstream Action Dis605 the proposer clarified that it did not intend to "use

the data for anything until a business asked us for a quote..., in which case we would access to data with the customers knowledge to provide a realistic quote".

We trust that this information will assist in the compilation of the Final Modification Report.

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

Yours sincerely,

Richard Court
Commercial Manager, Distribution.