

Bob Fletcher
Joint Office of Gas Transporters
31 Homer Road
Solihull
B91 3LT

19 May 2011

Dear Bob,

Re: UNC Modification 0362 - Use of 'notional Meter Readings' and 'Agreed Opening Meter Readings' for Individual CSEP Reconciliation

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) is supportive of this Modification Proposal. Please find below NGNs comments in respect of the Modification Proposal.

NGN are supportive of this Modification proposal.

Summary:

The proposal seeks to amend Annex A Part 5 of the generic LDZ Connected System Exit Point (CSEP) Network Exit Agreement (NExA) to enable 'notional Meter Readings' (i.e. estimated Opening Meter Readings) or 'Agreed Opening Meter Readings' to be used for the purposes of Individual Reconciliation at NDM CSEP Larger Supply Points.

NGN Stance:

NGN are supportive of this Modification proposal. Annex A part 5 of the generic LDZ CSEP NExA currently restricts the readings that can be utilised to derive a reconciliation volume to a 'Valid Meter Reading' as defined in the UNC. However, the UNC also allows for Notional and Agreed Opening Meter Readings to be used for individual NDM reconciliation.

Therefore it is both reasonable and efficient to allow Notional and Agreed Opening Meter Readings to be used at NDM CSEP LSPs as well as for individual NDM reconciliation.

Relevant Objectives:

We believe this Modification proposal would better facilitate Special Condition A11.1 (d), effective competition between Shippers due to a potentially increased accuracy and certainty in the allocation of costs.

Self Governance:

NGN are supportive of this Modification proposal being a self-governance modification.

Implementation:

As a self-governance Modification it would be implemented fifteen days after a decision by the Modification Panel. NGN are supportive of this timescale.

Legal Text:

NGN are happy with the proposed changes to the legal text.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,



Joanna Ferguson
Network Code Manager