

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

4 April 2011

Dear Bob,

Re: UNC Modification Proposal 0370 – Continuation of CV determination by National Grid Transmission on behalf of DNOs

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:

As outlined in the Offtake Arrangement Document, National Grid Transmission (NGT) determines calorific values (CVs) on behalf of the DNOs. The arrangement has an expiry date of 31 March 2007, which has now lapsed. This Modification Proposal if implemented will remove the obsolete date while allowing the arrangement to remain, providing a termination clause for NGT upon not less than six months notice to provide protection for all parties.

NGN Stance:

NGN believes that the implementation of this Modification would clarify the UNC in respect of the existing arrangements for the calculation of CV by removing the obsolete date referred to in OAD F1.1.1(c).

By providing a clause allowing NGT to terminate the arrangement with not less than six months notice the Modification Proposal would provide sufficient protection for all parties.

Relevant Objectives:

NGN believes this Modification Proposal would better further the relevant objective A11.1 (f); the promotion of efficiency in the implementation and administration of the Uniform Network Code as the removal of obsolete dates will provide clarity to the code further aiding it's efficient implementation.

Self Governance:

NGN agree with the Modification Panel's decision that this should be a self-governance Modification.

Implementation:

NGN agrees with the proposed implementation date of 15 Business Days after a Modification Panel vote to implement.

Legal Text:

NGN are satisfied that the legal text will deliver the intent of the Modification.

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