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**National Gas Emergency Service - 0800 111 999\* (24hrs)**  
\*calls will be recorded and may be monitored

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06<sup>th</sup> January 2012  
Your Reference:UNC Modification Proposal 0390

**Re: UNC Modification Proposal 0390:**

**Introduction of a Supply Point Offtake Rate Review and Monitoring Process**

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal which National Grid Gas Distribution (NGD) supports.

**Do you support or oppose implementation?**

**Support**

**Please summarise (in one paragraph) the key reason(s) for your support/opposition.**

We believe the proposal should be implemented for the following reasons. While there currently is an obligation on Shippers to ensure the Supply Point Offtake Rate (SPOR) is accurate, (SPORs should be neither substantially overstated nor understated); evidence suggests that many SPORs no longer accurately reflect the true rate of offtake at the supply point. We believe that the main reason for this is that there is no financial incentive, (or routine process), for Shippers to initiate proactive correction of incorrect SPORs. We would emphasise that even in the absence of these measures shippers have obligations under TPD Section G 5.3.3 to maintain these values as accurately as they are able. While this proposal does not go so far as to include financial incentive, it is our aspiration that a thorough review of SPORs will significantly improve the accuracy of SPORs.

NGD agrees with the Proposers view that SPORs are a key data item used in the construction and operation of network analysis models, which aid an efficient planning process and hence lead to the efficient and economic development of the relevant pipeline system. The implementation of this Modification Proposal is therefore timely and appropriate in order for the output to flow through into the planning process, ultimately benefiting all consumers.

## **Are there any new or additional issues that you believe should be recorded in the Modification Report**

NGD have not identified any new issues.

### **Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

- a) Efficient and economic operation of the pipe-line system.
- c) Efficient discharge of the licensee's obligations.
- f) Promotion of efficiency in the implementation and administration of the Code

NGD fully agree with the reasoning provided in the Draft Modification Report that implementation of Modification Proposal 390 will further the achievement of relevant objectives (a), (c) and (f)

### **Impacts and Costs:**

NGD do not foresee any significant impacts or material costs as a consequence of implementation of Modification Proposal 390.

### **Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

In order to allow for production of the April 2012 "Transporter SPOR Report", the Modification Proposal should be implemented as soon as reasonably practicable.

### **Legal Text:**

NGD agree that the legal text will deliver the intent of the Modification and would like to reiterate National Grid NTS comments within their representation regarding the required amendments to the UNC Transition Document.

We would also point out an error within the provided Legal Text.

5.1.5 The date under paragraph 15.1.4(d)

*should read*

5.1.5 The date under paragraph 5.1.4(d)

## **Is there anything further you wish to be taken into account?**

We have not identified any further issues.

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

Please contact me on 01926 65 5299 (andy.clasper@uk.ngrid.com) should you require any further information

Yours sincerely,

Andy Clasper  
Network Code, Distribution