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Your Reference: UNC Modification Proposal 0409S.

UNC Modification Proposal

0409S: Removing the restriction on the Users' application quantity for Annual NTS Exit (Flat) Capacity

Dear Bob,

Thank you for your invitation seeking representation with respect to the above Modification Proposal which National Grid Gas Distribution (NGD) would like to support.

Do you support or oppose implementation?

Support.

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

It is prudent to amend TPD Section B Annex B-1. This would prevent the original intentions of Modification 0290 from being frustrated by current contractual arrangements, which appear to have continued due to an oversight. Implementation would facilitate the release of unrestricted Annual NTS Exit (flat) Capacity, at the discretion of NTS, which is currently limited by the provisions of Annex B-1. Removal of the restrictions will allow individual Users to apply for Annual NTS Exit (Flat) Capacity in excess of the remaining Capacity, of this type, at a location. NGD agrees with the Proposer that this is a prudent and logical approach.

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

No

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

Yes.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Standard Special Condition A11.1 (f) Promotion of efficiency in the implementation and administration of the Code.

This restriction is being disregarded in practice because it was not the intention of the affected parties. It is therefore prudent to amend the UNC accordingly. Correcting the contract to be consistent with working practices is consistent with the promotion of this objective.

Impacts and Costs:

No costs are anticipated.

Implementation:

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

We have nothing to add to the information identified within the Draft Modification Report.

Legal Text:

NGD is satisfied that the text as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

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

No.

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

Please contact me on 01926 653994 (alison.chamberlain@uk.ngrid.com) should you require any further information.

Yours sincerely,

Alison Chamberlain
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