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7<sup>th</sup>, June, 2013

Your Reference: UNC Modification Proposal 0433s.

Re: UNC Modification Proposal 0433s: Inclusion of the Transmission to Distribution "System Operator Agreement Guidelines" within the Offtake Arrangements Document.

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 the key reason(s) for your support.**

These agreement guidelines, which have been in operation since the termination of the SOMSA arrangements, are proposed for adoption within the UNC with the aim of delivering industry standard governance arrangements for this document going forward. This will enhance visibility surrounding any future changes, assist in version control and help to ensure that changes are made in an equitable manner without placing a burden on unaffected parties. We also approve with the removal of all remaining references to SOMSA in the UNC, which is to be carried out at the same time as adopting this document.

**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:**

NGD believes that implementation of this proposal is consistent with the furthering Relevant Objective f), as implementation would promote efficiency in the implementation and administration of the Code.

**Impacts and Costs:**

Minor costs are associated with updating the scripts for each Transporter's IS reporting help line.

**Implementation:**

No implementation lead time is required. As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement.

**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 653559 (alan.raper@nationalgrid.com) should you require any further information.

Yours sincerely,

Alan Raper  
National Grid Gas, Distribution