

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

Alan Raper
Network Code Manager, Distribution
Alan.raper@uk.ngrid.com
Direct tel +44 (0)1926 65 3559

www.nationalgrid.com

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Your Reference:UNC Modification Proposal 0370.

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

Dear Bob,

Thank for your invitation seeking representations with respect to the above Modification Proposal.

Do you support or oppose implementation?

Support

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

National Grid Distribution (NGD) believes that this Modification Proposal usefully clarifies the arrangements under which National Grid Transmission (NTS) undertakes the activity of daily calorific value determination on behalf the Distribution Network Operators (DNOs). Implementation would remove a date from the current version of the UNC that is no longer relevant and implies that the NTS provision of the CV determination service has already terminated. The proposal looks to confirm that the service is an enduring one, while setting out a process and timescale by which either party may exit from the arrangement, should they wish to do so.

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

We have not identified any such issues.

Self governance statement:

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

This Modification Proposal facilitates the continuation of a service which is currently being undertaken to the satisfaction of all parties. NGD believes that implementation of this Proposal would not have any material impact on the current arrangements and can be implemented without changing any party's current obligations.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The Proposal facilitates the relevant objective as set out within Standard Special Condition A11.1 (f): Promotion of efficiency in the implementation and administration of the Code. NGD believes that removing a date which has long since expired and clarifying the existing arrangements is consistent with this objective.

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

There would be no change to the prevailing arrangements. No additional costs would be incurred or analysis required.

Implementation:

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

This Modification Proposal could be implemented immediately upon direction from the UNC Modification Panel.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

NGD has provided the suggested legal text with respect to this Modification Proposal. It is not anticipated that any changes will be required to this text when formal text is requested by the UNC Modification Panel.

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

NGD has not identified any such matters.

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

Please contact me on 01926 653559 (alan.raper@uk.ngrid.com) should you require any further information.

Yours sincerely,

Alan Raper
Network Code Manager, Distribution.