

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

7 September 2012

Dear Bob,

Re: UNC Modification Proposal 0384S - UNC Modification Rules; housekeeping, clarity and minor drafting changes

Thank you for the opportunity to provide representation of the above noted Modification Proposal. Northern Gas Networks (NGN) supports this Modification Proposal. Please find below NGN's comments in respect of the Modification Proposal.

NGN supports this Modification proposal.

Summary of key reasons:

The implementation of the Code Governance Review in early 2011 has driven the introduction of this proposal, which cleans up and clarifies various areas that have been affected by the new arrangements. Implementation of this Modification Proposal will make the Modification rules more practical and easy to understand.

Additional or new issues:

N/A

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?

Condition	Description	NGN View
A11.1(a)	Efficient and economic operation of the pipe-line system	
A11.1(b)	Efficient and economic operation of the combined pipe-line systems	
A11.1(c)	Efficient discharge of the licensee's obligations	
A11.1(d)	Securing effective	

	competition: i) Between shippers ii) Between suppliers iii) Between DN operators and shippers	
A11.1(e)	Provision of economic incentives for security of supply to domestic customers	
A11.1(f)	Promote efficiency in the implementation and administration of the UNC	Clarifying the UNC changes made in the Code Governance Review will ensure clarity and therefore promote efficiency in the implementation and administration of the UNC.

Impact and costs:

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

N/A

Implementation:

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

As this is a self-governance modification, implementation could be 16 business days after a Modification Panel decision to implement.

Legal Text:

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

Yes.

Any further information:

N/A

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,



Alex Ross-Shaw
 Network Code Officer