

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

2 March 2012

Dear Bob,

Re: UNC Modification Proposal 0396 and 0403

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

NGN supports these Modification proposals.

Summary of key reasons:

NGN supports both Modification Proposals concerning the implementation of the 21 Day switching that is a requirement of the Supplier Licence. Implementation of either Modification Proposal will ensure Supplier compliance with the EU Third Package directive. However, we believe that it is for suppliers to assess the individual impacts on their own processes due to the differences between the modifications in order to express a preference.

Additional or new issues:

We have identified no new or additional issues.

Self Governance Statement:

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

N/A

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	N/A
A11.1(b)	Efficient and economic operation of the combined pipe-line systems	N/A
A11.1(c)	Efficient discharge of the licensee's obligations	Implementation of either Modification Proposal would allow suppliers to fulfil their obligations.
A11.1(d)	Securing effective competition:	N/A

	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	N/A
A11.1(f)	Promote efficiency in the implementation and administration of the UNC	N/A

Impact and costs:

NGN believes that both Modification Proposals should be User Pays as these are as a direct result of supplier licence obligations.

Implementation:

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

We support the lead time as put forward in the Modification Proposals.

Legal Text:

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

Yes.

Any further information:

No.

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,



Joanna Ferguson
 Network Code Manager