

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

7 September 2012

Dear Bob,

Re: UNC Modification Proposal 0416S - Extending the data provision permissions created by Modification 0279 regarding historic asset and read data provision

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:

Shippers have advised that on acquiring a site they are unable to assess if there are any data discrepancies until receipt of the annual report in May or June each year. The ability to request and be provided with this data throughout the year will lead to a quicker resolution of data discrepancies and minimise the impact of such data discrepancies.

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	Creating a level playing field

	competition: i) Between shippers ii) Between suppliers iii) Between DN operators and shippers	for incoming shippers will remove the current inequity and help secure effective competition.
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	

Impact and costs:

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

There are no development or implementation costs associated with the proposed changes to the UNC.

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