

Northern Gas Networks Limited

Registered in England & Wales No 5167070 Registered Office 1100 Century Way Colton Leeds LS15 8TU

Tel: 0113 397 5300

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

10 December 2013

Dear Bob,

Re: UNC Modification Proposal 0462 - Introducing Fast Track Self Governance into the Uniform Network Code

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:

Implementation of this proposal will include provisions for a fast-track self-governance process in the UNC thereby satisfying the Transporter Licence.

Additional or new issues:

NA

Self Governance Statement:

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

NA

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	Supports this relevant
	obligations	objective.
A11.1(d)	Securing effective competition:	
	i) Between shippers	
	ii) Between suppliers	
	iii) Between DN operators and	
	shippers	



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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	Supports this relevant objective.
A11.1(g)	Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-Operation of Energy Regulators	

Impact and costs:

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

NA

Implementation:

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

Implementation can take place as soon as practical following a direction from the Authority.

Legal Text:

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

Yes

Any further information:

NA

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

Max Romohan