

Representation for Modification Proposal 0098/0098A  
“Modification to Codify Emergency Curtailment Quantity (ECQ) Methodology”

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1<sup>st</sup> September 2006

Dear Julian,

**Re: Modification Proposals 0098/0098A: “Modification to Codify  
Emergency Curtailment Quantity (ECQ) Methodology”**

Thank you for your invitation seeking representation with respect to the above Modification Proposals. National Grid Gas NTS does not support UNC Modification Proposal 0098, but does offer support to the alternate UNC Modification Proposal 0098A. The rationale for this position is outlined below:

UNC Modification Proposal 0098:

UNC Modification Proposal 0098 suggests both the application of UNC governance processes to the Emergency Curtailment Quantity (ECQ) methodology and also the additional use of Shipper Nominations to calculate ECQ.

National Grid Gas NTS agrees with the former intention to place the ECQ methodology within the UNC governance process. However the latter aspect would require the operation of additional processes for collation and transfer of Nomination information to DN's for ECQ calculation and return of ECQ values to National Grid Gas NTS. This is as the large majority of Daily Metered Sites are connected to the DN networks which do not have direct access to Shipper Nomination information. System changes to support these new processes would be extensive, requiring major redevelopment of core business applications.

Resultantly National Grid Gas NTS does not believe that additional complexity added by this amendment to the ECQ Methodology, meets the requirements of Standard Special Condition A11/2 of the GT License.

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UNC Modification Proposal 0098A:

It is the opinion of National Grid Gas NTS that the alternate UNC Modification Proposal 0098A suggesting only the placement of the current ECQ methodology within the UNC governance process, offers a preferable option for formalising the change process to the ECQ methodology, without adding additional complexity.

If you or the SME require any further information or clarification regarding this representation, please contact Jay Munbodh in the first instance.

Yours faithfully,

Ritchard Hewitt