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7<sup>th</sup> September 2018  
Your Reference: UNC Modification Proposal 0654

## UNC Modification Proposal 0654 – Mandating the provision of NDM Sample Data

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal which Cadent would like to offer support.

### **Do you support or oppose implementation?**

Support

### **Relevant Objective:**

d) Positive

f) Positive

### **Reason for support/opposition:**

We agree that the mandatory provision by Shipper Users of data in support of the NDM sample would be expected improve NDM allocation profiles and EUC development. The measures proposed including PAC reporting would also be likely to assist in the reduction of Unidentified Gas (UIG).

### **Self-Governance statement**

We do not believe this Modification is sufficiently material to require an Authority decision and consequently would recommend that self-governance procedures be applied.

## **Implementation**

We note that a minimum of 3 months notice of implementation would be desirable.

## **Impacts and Costs**

We note that limited costs would be incurred by the CDSP to implement this Proposal.

## **Legal Text**

We are satisfied that the Legal Text meets the intent of the solution.

## **Are there any errors or omissions in this Modification Report that you think should be taken into account?**

We have not identified any errors or omissions.

## **Please provide below any additional analysis or information to support your representation**

We have not identified any additional analysis or information.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07778 150668 ([chris.warner@cadentgas.com](mailto:chris.warner@cadentgas.com)) should you require any further information.

Yours sincerely,

Chris Warner  
Industry Codes Manager, Regulation & External Affairs