

Joint Office

Enquiries@gasgovernance.co.uk

7 September 2018

Dear Joint Office,

Re: UNC Modification Proposal 0654 – Mandating the Provision of NDM Sample Data

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this Modification.

NGN supports this Modification proposal.

Reasons for Support/Opposition:

NGN supports this modification as the provision of increased levels of Non-Daily Metered sample data from Shippers to the Central Daily Service Provider should aid the Demand Estimation Sub-Committee in the analysis and activities undertaken to set the annual End User Category profiling. This should lead to the subsequent allocations being more accurate. The inclusion of Performance Assurance Committee oversight of this provides appropriate levels of scrutiny for compliance with the arrangements.

Self-Governance Statement:

This modification should be subject to the Self-Governance procedure as its implementation would not directly have a material impact on industry parties or processes.

Relevant Objectives:

We agree that this proposal would further Relevant Objectives d) "Securing of Effective Competition" as the provision of additional sample data should improve the accuracy of EUC profiling. We do not believe that this has any impact on Relevant Objective f) "Promotion of efficiency and administration of the network code".

Impact and costs:

No material impacts or costs have been identified.

Implementation:

The implementation date should be set by Transporters, subject to industry discussion and agreement through the Data Services Contract (DSC) Change Management Committee.

Smell gas?

Call the National Gas Emergency
Service on 0800 111 999

a 1100 Century Way
Thorpe Park Business Park
Colton, Leeds LS15 8TU

t 0113 397 5300
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the network**

Legal Text:

NGN considers that the legal text will deliver the solution set out in the modification.

Errors or Omissions in the Modification Report:

None identified.

Any additional comments:

None.

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,

[By email]

Joanna Ferguson
Regulation & Industry Codes Manager

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