

Joint Office  
[enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

26 March 2020

Dear Sir or Madam,

**Re: 0713S Amendments to TPD V3.1.7 Independent Assessment table**

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 change.

**NGN supports this Modification Proposal.**

**Reason for support/opposition:**

Please summarise (in one paragraph) the key reason(s)

We support this proposal as amendment of the Independent Assessment Table in Transportation Principal Document (TPD) Section V3.1.7, to take account of the amended Graydons methodology for determining credit ratings, will ensure that the table is accurate and up to date. This should facilitate the continued availability to shippers of a choice of multiple independent assessment agencies, thus furthering Relevant Objectives d) *Securing of effective competition* and f) *Promotion of efficiency in the implementation and administration of the Code*.

The additional amendment to provide clarity to the rating description against Independent Assessment Score '0' for Dunn and Bradstreet/N2 Check Comprehensive Report also furthers these same Relevant Objectives.

**Self-Governance Statement:**

Please provide your views on the self-governance statement.

This proposal should follow Self-Governance procedures as it only seeks to insert the updated Graydons Credit Rating methodology into the Independent Assessment table in UNC TPD V3.1.7 and add clarity to the existing Dunn and Bradstreet/N2 Check Comprehensive Report rating; these changes are not of material impact to Shippers who choose to use Graydons ratings.

**Implementation:**

What lead-time do you wish to see prior to implementation and why?

This proposal could be implemented 16 business days after Modification Panel approval, subject to no appeal being raised.

**Impacts and Costs:**

What analysis, development and ongoing costs would you face?

NGN has identified no analysis or development required and no ongoing costs incurred as a result of this proposal.

**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  
**w** [northerngasnetworks.co.uk](http://northerngasnetworks.co.uk)

**we are  
the network**

**Legal Text:**

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

We believe the legal text provided should deliver the Solution set out in the modification.

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

Include details of any impacts/costs to your organisation that are directly related to this.

None identified.

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

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,

Tracey Saunders (via email)  
Market Services Manager (Industry Codes)  
Mobile: 07580 215 743

**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  
**w** [northerngasnetworks.co.uk](http://northerngasnetworks.co.uk)

**we are  
the network**