

AW/PW/119

Mark Feather  
Director, Industry Codes and Licensing  
Ofgem  
9 Millbank  
London  
SW1P 3GE

26 June 2009

Dear Mark


**Re: Timing out of code modification proposals**

Thank you for the opportunity to respond to your letter of 13 May 2009 on the “timing-out” of code modification proposals. Northern Gas Networks (NGN) only has experience of Uniform Network Code (UNC) in respect of the modification process, and can only comment in the context of the UNC modification process.

The current UNC modification process results in the actual implementation date of a UNC modification proposal set by the Transporters based on practical limitations and completion of any necessary system changes. Consequently, we do not believe that the proposed licence change would impact materially on the current process. Nevertheless, NGN has no objections to the licence modification and we can confirm that we believe that the legal text is consistent with the proposed Option C approach.

Please note that this response can be regarded as non-confidential.

Yours sincerely



Alex Wiseman  
Regulation Director