

95/007

INITIAL WRITTEN ASSESSMENT for Modification Proposal P192 Change of Name of the Transmission Company

Prepared by: ELEXON¹ Limited

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This document has been distributed in accordance with Section $F2.1.10^2$ of the Balancing and Settlement Code.

RECOMMENDATIONS

On the basis of the initial assessment BSCCo recommends that the Panel:

- DETERMINE that Modification Proposal P192 should be submitted directly to the Report Phase;
- AGREE the Report Phase timetable such that a draft Modification Report should be completed and submitted to the Panel for consideration at their meeting of 8 September 2005;
- AGREE the draft legal text for Proposed Modification P192; and
- AGREE that the draft Modification Report contains a recommendation that P192 should be made with an Implementation Date of 5 Working Days after an Authority decision is made.

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¹ ELEXON Ltd currently fulfils the role of the Balancing and Settlement Code Company ('BSCCo'), pursuant to Annex X-1 of the Balancing and Settlement Code (the 'Code').

² The current version of the Code can be found at <u>http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx</u>

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as BSCCo has been able to assess the following parties/documents have been initially identified as being potentially impacted by Modification Proposal P192.

Parties		Sections of the	e BSC	Code Subsidiary Documents	
Suppliers		А		BSC Procedures	\boxtimes
Generators		В		Codes of Practice	\boxtimes
Licence Exemptable Generators		С		BSC Service Descriptions	\boxtimes
Transmission Company	\boxtimes	D		Service Lines	\boxtimes
Interconnector		E		Data Catalogues	\boxtimes
Distribution System Operators		F		Communication Requirements Documents	
Non-Physical Traders		G		Reporting Catalogue	\boxtimes
Party Agents		Н		MIDS	
Data Aggregators		I		Core Industry Documents	
Data Collectors		J		Grid Code	
Meter Operator Agents		К		Supplemental Agreements	
ECVNA		L		Ancillary Services Agreements	
MVRNA		М		Master Registration Agreement	
BSC Agents		Ν		Data Transfer Services Agreement	
SAA		0		British Grid Svstems Aareement	
FAA		Р		Use of Interconnector Agreement	
BMRA		Q		Settlement Agreement for Scotland	
ECVAA		R		Distribution Codes	
CDCA		S		Distribution Use of System Agreements	
ТАА		т		Distribution Connection Agreements	
CRA		U		BSCCo	
Teleswitch Agent		V	\boxtimes	Internal Working Procedures	\boxtimes
SVAA		W		Other Documents	
BSC Auditor		Х	\boxtimes	Transmission Licence	
Profile Administrator				System Operator-Transmission Owner Code	
Certification Agent				X = Identified in Report for last Procedure	
MIDP				N = Newly identified in this Report	
Other Agents					
SMRA					
Data Transmission Provider					

1 DESCRIPTION OF PROPOSED MODIFICATION

1.1 Modification Proposal

Modification Proposal P192 'Change of Name of the Transmission Company' (P192) was raised on 27 July 2005. P192 proposes that the Code be modified to reflect the new name of the Transmission Company – National Grid Electricity Transmission plc.

A motion was submitted to the Annual General Meeting of the Transmission Company held on 25th July 2005 proposing to change the Company name from "National Grid Company plc" to "National Grid Electricity Transmission plc". The motion also amended the Group Company name to "National Grid plc" (formerly "National Grid Transco plc"). The motion was approved by shareholders and the changes took effect legally on 27th July 2005.

The definition of the Transmission Company should consequently be amended in the Code to align with the new legal name of the Company.

It should be noted that although the company name has changed, the company number remains the same. Legally there would be no interpretational problems with the current reference to National Grid Company Plc, while the Modification Proposal is progressed.

1.2 Issues Raised by the Modification Proposal

An initial assessment of Modification Proposal P192 has identified the following issue which has been considered and addressed within this Initial Written Assessment:

1.2.1 Implementation Approach

It is proposed that the Code changes be implemented within 5WD of an Authority Decision.

A number of Code Subsidiary Documents (CSDs) and other Configurable Items include references to 'NGC' and are impacted by P192. It is proposed that the CSD changes are not implemented for the P192 Implementation Date, but updated when the relevant documents are next open for change. It would not be economical to open so many documents up at once, for changes not affecting business processes.

Any documents which are not updated within 2 years of the P192 Implementation Date, would be batched into a Change Proposal and progressed through the standard change process at that time.

1.2.2 Solution

To address the references to 'NGC' and 'National Grid Company Plc' in the CSDs. The following rules have been identified for which references should change:

1. Where NGC is being referred to in the role of the Transmission Company or the System Operator, it is recommended that these references be changed to 'Transmission Company' or 'System Operator' as appropriate. This would ensure that in the event of the Transmission Company changing names in the future, only minimal CSD changes would be required.

Eg. 'NGC The Transmission Company is responsible for registering.....'

2. Where the 'NGC' or 'The National Grid Company plc' is being referred to as the company operating in the role of the Transmission Company or System Operator, it is recommended that these references be replaced by 'NGET' or 'National Grid Electricity Transmission plc' respectively where appropriate.

Eg. 'For this purpose, the "users" include BSCCo Ltd, Ofgem, NGC NGET as the Balancing Mechanism Operator....'

3. References to 'NGC' which are part of a data flow name, function name, data item name, data group name or abbreviation will *not* be changed as these would constitute uneccesary BSC systems changes, which would need to reflected in participant systems and would therefore be costly.

Some references to NGC will therefore remain in the CSDs. To address any confusion with the remaining NGC references the legal drafting has included text stating that any references to NGC shall mean National Grid Electricity Transmission. This is in additon to the suggested text in the Modification Proposal form (Annex 1).

This draft legal text also caters for the scenario of not changing any of the CSDs references to NGC. As stated in section 1.1, legally there is no confusion with who the Transmission Company is. Therefore the Panel could decide to not make any amendments to the CSDs.

Further detail of the suggested changes is included in Annex 4. Please note that the changes detailed in Annex 4 may be subject to change if additional references are identified. Since the changes to CSDs will be made on an opportune basis, these will be reviewed by industry during the implementation process. Annex 5 details the items which will remain with NGC references.

2 COSTS³

2.1 Progressing Modification Proposal

PROGRESSING MODIFICATION PROPOSAL

Meeting Cost	£0
Legal/expert Cost	£0
Impact Assessment Cost	£0
ELEXON Resource	5 Man days equating to £ 930

2.2 Implementation Cost

The changes to CSDs and other Configuarable Items will be made on an opportune basis (i.e. when the documents are next open for change) and therefore the associated cost of delivery will be negligible.

It is proposed that any required changes to CSDs not made within 2 years would be delivered by a Change Proposal, which would have its own associated cost for delivery.

3 INITIAL ASSESSMENT OF IMPACTS OF MODIFICATION PROPOSAL

3.1 Impact on BSC Systems and Processes

An initial assessment has been undertaken in respect of all BSC Systems and processes and there is no impact on BSC Systems and Processes.

 $^{^{\}rm 3}$ Clarification of the meanings of the cost terms in this section can be found in annex 3 of this report Issue/Version number: FINAL/1.0

3.2 Impact on Other Systems and Processes used by Parties

An initial assessment has been undertaken in respect of systems and processes used by Parties and no areas have been identified as potentially being impacted by the Modification Proposal.

3.3 Impact on Documentation

3.3.1 Impact on Balancing and Settlement Code

An initial assessment has been undertaken in respect of all Sections of the Code and the following Sections have been identified as potentially being impacted by the Modification Proposal.

Item	Potential Impact of Proposed Modification
Section X-1	The Transmission Company is currently defined as 'The National Grid plc, registered number 02366977;'
	This will be amended to 'National Grid Electricity Transmission plc, registered number 02366977, and any reference to "NGC" in the Code or any Code Subsidiary Document shall have the same meaning;'
Section V	NGC Demand Forecast (DF) will become Transmission Company Demand Forecast (DF)

3.3.2 Impact on Code Subsidiary Documents

An initial assessment has been undertaken in respect of all CSDs and the following documents have been identified as potentially being impacted by the Modification Proposal.

Item(s)	Potential Impact of Proposed Modification
BSCP14, BSCP15, BSCP20, BSCP68, BSCP75, BSCP508	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate. Where 'NGC' is part of a flow, group, data name, these items should not be changed.
Reporting Catalogue NETA Data File Catalogue	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate. Where 'NGC' is part of a flow, group, data name, these items should not be changed.
Interface Definition and Design (IDD) Part 1, IDD Part 2	References to 'NGC' should be either replaced with 'NGET' or the System Operator as appropriate. Where 'NGC' is part of a flow, group, data name, these items should not be changed.
Service Descriptions: Central Data Collection Agent, Settlement Administration Agent, Schedule,	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate. Where 'NGC' is part of a flow, group, data name, these items should not be changed.
SVAA Service Line 330	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.
Initial Settlement and Reconciliation Agent (ISRA) System Management Guide,	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.

ISRA Technical Specification.	
User Requirement Specification: CDCA, CRA, ECVAA, FAA, SAA, SVAA, TAA, Website,	References to 'NGC' should be either replaced with 'NGET' or the System Operator as appropriate. Where 'NGC' is part of a flow, group, data name, these items should not be changed.

3.4 Impact on Core Industry Documents

As part of the NGC name change, National Grid Electricity Transmission are submitting separate changes to address the name change in other Industry Codes. These changes are independent of P192.

The proposed changes made to the Grid Code were sent out for industry consultation on 29 July 2005 and comments are due back on 15 August 2005 (ref F/05). Any impact on P192 will be detailed in the P192 draft Modification Report.

An Amendment Proposal (CA014) has been submitted to amend the System Operator - Transmission Code (STC) and STC Procedures to reflect NGCs new name.

3.5 Impact on Other Configurable Items

An initial assessment has been undertaken in respect of other configurable items and the following areas have been identified as potentially being impacted by the Modification Proposal.

Item	Potential Impact of Proposed Modification
ELEXON Website	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.
ELEXON internal Procedures	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.
BSC Summary	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.
BSC Agent Documentation	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.

4 IMPACT ON BSCCO

An initial assessment has been undertaken in respect of BSCCo and the following areas have been identified as potentially being impacted by the Modification Proposal.

Area of Business	Potential Impact of Proposed Modification
BSCCo Contracts (Excluding BSC Agent Contracts)	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.

5 IMPACT ON BSC AGENT CONTRACTUAL ARRANGEMENTS

An initial assessment has been undertaken in respect of BSC Agent contractual arrangements and the following areas have been identified as potentially being impacted by the Modification Proposal.

BSC Agent Contract	Potential Impact of Proposed Modification
LogicaCMG (BMRA, CRA, CDCA, SAA, ECVAA, TAA, FAA)	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.
Cap Gemini (SVAAO)	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.
PwC (BSC Auditor, Certification Agent)	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.
IMSERV (Profile Administrator)	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate
EASL (Teleswitch Agent)	References to 'NGC' should be either replaced with 'NGET' or the Transmission Company as appropriate.

6 RATIONALE FOR BSCCO'S RECOMMENDATIONS TO THE PANEL

BSSCO recommends that Modification Proposal P192 proceed directly to the Report Phase with the recommendation that P192 be approved with an Implementation Date of 5 Working Days after an Authority decision.

The rational for this recommendation is that it is self-evident that P192 better facilitates Applicable BSC Objectives (a) and (d):

- Ensuring that the correct definition of the Transmission Company appears in the Code better facilitates BSC Objective (a) the efficient discharge by the Transmission Company of the obligations placed upon it by the Transmission Licence.
- In relation to the work carried out by BSCCo and its agents in the assessment of Modification Proposals, the Modification Proposal better facilitates BSC Objective (d) promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

7 PROCESS, TIMETABLE AND COST FOR PROGRESSING THE MODIFICATION PROPOSAL

BSCCo recommends that this Modification Proposal P192 proceed directly to Report Phase with the recommendation that P192 be approved with an Implementation Date of 5 Working Days after an Authority decision. This allows time for the Code changes to be implemented. The changes to CSDs will be delivered on an opportune basis, with a backstop of 2 years.

8 DOCUMENT CONTROL

8.1 Authorities

Version	Date	Author	Reviewer	Reason for Review
0.1	02/08/05	Change Delivery	Tom Bowcutt	Peer Review
0.2	02/08/05	Change Delivery	Sarah Jones	Technical Review
0.3	04/08/05	Change Delivery	David Osborne	Quality Review

8.2 References

Ref No.	Document Title	Owner	Issue Date	Version	
	P192 Modification				
	Proposal				

ANNEX 1 MODIFICATION PROPOSAL

Modification Proposal – BSCP40/06

MP No: 192 (mandatory by BSCCo)

Title of Modification Proposal (mandatory by originator):

Change of Name of the Transmission Company.

Submission Date (mandatory by originator): 27 July 2005

Description of Proposed Modification (mandatory by originator)

This Modification Proposal proposes that the BSC be modified to reflect the new name of the Transmission Company – National Grid Electricity Transmission plc.

Description of Issue or Defect that Modification Proposal Seeks to Address (mandatory by originator)

A motion was submitted to the Annual General Meeting of the Transmission Company held on 25th July proposing to change the Company name from "National Grid Company plc" to "National Grid Electricity Transmission plc". The motion also amended the Group Company name to "National Grid plc" (formerly "National Grid Transco plc"). The motion was approved by shareholders and the changes took effect legally on 27th July.

The rationale behind the change is that, in the light of the name of the Group Company becoming "National Grid plc", the name of the Transmission Company as a subsidiary company within the Group should also be amended to avoid any potential confusion between the two entities. The definition of the Transmission Company should consequently be amended in the BSC to align with the new legal name of the Company. The registered number of the company is unchanged.

Impact on Code (optional by originator)

A change will be required to Section X of the BSC (Definitions and Interpretation) to amend the definition of the Transmission Company as follows:

"Transmission Company" means The "National Grid Electricity Transmission plc" registered number 2366977

Impact on Core Industry Documents or System Operator-Transmission Owner Code (optional by originator)

Similar amendments are being put forward separately for the Grid Code, the STC and (in due course) the CUSC, otherwise there is no impact on Core Industry Documents.

Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties (optional by originator)

None.

Impact on other Configurable Items (optional by originator)

A number of configurable items will be impacted and will be amended in due course.

Modification Proposal – BSCP40/06

MP No: 192 (mandatory by BSCCo)

Justification for Proposed Modification with Reference to Applicable BSC Objectives (mandatory by originator)

Ensuring that the correct definition of the Transmission Company appears in the BSC better facilitates BSC Objective (a) – the efficient discharge by the Transmission Company of the obligations placed upon it by the Transmission Licence.

In relation to the work carried out by BSCCo and its agents in the assessment of Modification Proposals, the Modification Proposal better facilitates BSC Objective (d) – promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

Details of Proposer:

NameJohn Greasley
OrganisationNational Grid Electricity Transmission plc
Telephone Number01926 656313
Email Addressjohn.greasley@ngtuk.com
Details of Proposer's Representative:
NameRichard Dunn
OrganisationNational Grid Electricity Transmission plc
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Details of Representative's Alternate:
<i>Name</i> Clare Talbot
OrganisationNational Grid Electricity Transmission plc
Telephone Number01926 656377
<i>Email address</i> clare.talbot@ngtuk.com
Attachments: No (mandatory by originator)
If Yes, Title and No. of Pages of Each Attachment:

ANNEX 2 DRAFT LEGAL TEXT

The draft legal text for P192 is contained in Attachment 1 to this document.

ANNEX 3 CLARIFICATION OF COSTS

	PROGRESSING MODIFICATION PROPOSAL
Meeting Cost	This is the cost associated with holding Modification Group meetings and is based on an estimate of the travel expenses claimed by Modification Group members.
Legal/expert Cost	This is the cost associated with obtaining external expert advice, usually legal advice.
Impact Assessment Cost	Service Provider Impact Assessments are covered by a pre-determined monthly contractual charge. Therefore the cost included in this report is an estimate based on the level of impact assessment that the modification is expected to require and may not reflect the actual cost attributed to the modification, which will be based on a percentage of the contractual impact assessment costs for each month that it is assessed.
ELEXON Resource	This is the ELEXON Resource requirement to progress the Modification Proposal through the Modification Procedures. This is estimated using a standard formula based on the length of the Modification Procedure.

ANNEX 4 PROPOSED CHANGES TO THE BALANCING AND SETTLEMENT CODE AND CODE SUBSIDIARY DOCUMENTS

Please note that the potential changes detailed here are may be subject to change. As the changes to CSDs will be made on an opportune basis, these will be reviewed by industry during implementation.

a) The Balancing and Settlement Code

Reference	Proposed Change	Document	Section(s)
means The National Grid Company plc, registered number 02366977;	means The National Grid Electricity Transmission Company plc, registered number 02366977, and any reference to "NGC" in the Code or any Code Subsidiary Document shall have the same meaning;	Section X-1	
NGC Demand forecast	The Transmission Company NGC Demand Forecast	Section V	Annex V-1

b) BSCP

Reference	Proposed Change	Document	Section(s)
The Transmission Company (NGC)	The Transmission Company (NGC)	BSCP14	1.2 (a), 1.6
if NGC erroneously	if NGC the Transmission Company erroneously	BSCP14	1.6
although in practice, NGC	although in practice, NGC the Transmission Company	BSCP14	1.6
NGC - National Grid Company (i.e. the Transmission Company)	TC NGC – National Grid Company (ie. the Transmission Company)	BSCP14	2.1
NGC National Grid Control Centre	NGC NGET National Grid Control Centre	BSCP14	4.1, 4.2
NGC	NGC the Transmission Company	BSCP14	4.3, 4.7
A Manifest Error claim has been raised by NGC	A Manifest Error claim has been raised by NGC the Transmission Company	BSCP14	4.11

"available" to NGC Panel (in consultation with NGC NGC further identifies that BMU2	NGC the Transmission Company	BSCP14	4.14
NGC	NGC the Transmission Company	BSCP14	footnote 20
Agree the TCCD NGC have advised.	TCCD NGC TC	BSCP15	3.2.4
Confirm TCCD NGC have advised, and Effective From Date			
This covers Generator Metering Systems, Interconnector Metering Systems, Metering Systems recording the demand from customers directly connected to the National Grid Company (NGC) Transmission System,	connected to National Grid Company (NGC) the Transmission System	BSCP20	1.1
NGC - National Grid Company	NGC - National Grid Company TC – Transmission Company	BSCP20	2.1
BM Unit Id (NGC):	NGC BM Unit Id Name (NGC): 4	BSCP68	4.1, 4.2
NGC is responsible for registering	NGC the Transmission Company is responsible for registering	BSCP75	4.1.12
This Metering System has been registered by NGC	This Metering System has been registered by NGC the Transmission Company	BSCP75	4.1.12
The Aggregation Rule for the above Interconnector will be submitted by NGC	The Aggregation Rule for the above Interconnector will be submitted by NGC the Transmission Company	BSCP75	4.1.12
NGC - Ancillary Services	NGC Transmission Company - Ancillary Services	BSCP508	1.2
NGC - TUoS	NGC Transmission Company - TUoS	BSCP508	1.2

⁴ Please note that this change has been included to reflect the BSC System use of this data item. NGC BM Unit Name, is a data item, and is therefore not changing. Issue/Version number: FINAL/1.0

NGC	NGC the Transmission Company	BSCP508	1.6.1
Produce NGC reports by Supplier.	Produce NGC the Transmission Company reports by Supplier.	BSCP508	3.2.9, 3.3.9
Send relevant NGC reports	Send relevant NGC the Transmission Company reports	BSCP508	3.2.13, 3.3.14

c) Business Definition Documents

Reference	Proposed Change	Document	Section
NGC Demand forecast (DF)	NGC Transmission Company Demand forecast (DF)	Reporting Catalogue	2.1
NGC, National Grid Company	Changes on a case by case basis as detailed in 1.2.2. Any Flow, Groups or Data items with NGC as part of the name should not be changed.	NDFC, Annex A, B, C, D, F, G, H	Many references

d) Interface Definition and Design

Reference	Proposed Change	Document	Section
All references to NGC outside of flows	can be referenced as SO or TC as appropriate	Part 1 word	Many
Any NGC references inside the flows	To remain as NGC	Part 1 word	Many
NGC File Format	NGC SO File Format	Part 2 word	Many
NGC Tabs in IDD spreadsheet	NGC SO Tabs in IDD spreadsheet	Part 2 word	2.1.4.1, BMRA-I014
NGC	SO	Part 2 word	BMRA-I002

'NGC' Tab	`SO' Tab	IDD Spreadsheet	
	Any Other Changes not covered, amend on a case by case basis as detailed in 1.2.2. Any Flow, Groups or Data items with NGC as part of the name should not be changed.		

e) Service Description

Reference	Proposed Change	Document	Section
between two Distribution Systems, to NGC where required;	between two Distribution Systems, to NGC the Transmission Company where required;	CDCA	19.5
NGC connection agreement;	NGC NGET connection agreement;	CDCA	22.2 c
NGC	NGC the Transmission Company	CDCA	Appendix B (B1) X2
NGC	NGC the Transmission Company	SAA	Appendix B (B2), (B3)
NGC	NGC the Transmission Company	Schedule	
NGC	NGC NGET	SSL 330	5.1.1

f) User Requirement Specification

Reference	Proposed Change	Document	Section
SO (NGC), National Grid Company, National Grid Company PLC, national grid reference	Changes on a case by case basis as detailed in 1.2.2. Any Flow, Groups or Data items with NGC as part of the name should not be changed.	BMRA	Many

SO (NGC), National Grid Company, National Grid Company PLC, national grid reference	Changes on a case by case basis as detailed in 1.2.2. Any Flow, Groups or Data items with NGC as part of the name should not be changed.	CDCA	Many
SO (NGC), National Grid Company, National Grid Company PLC, national grid reference	Changes on a case by case basis as detailed in 1.2.2. Any Flow, Groups or Data items with NGC as part of the name should not be changed.	CRA	Many
SO (NGC), National Grid Company, National Grid Company PLC, national grid reference	Changes on a case by case basis as detailed in 1.2.2. Any Flow, Groups or Data items with NGC as part of the name should not be changed.	ECVAA	Many
NGC Transmission System, The National Grid Company plc	NGC NGET Transmission System, The National Grid Electricity Transmission Company plc	FAA	Few
SO (NGC), National Grid Company, National Grid Company PLC, national grid reference	Changes on a case by case basis as detailed in 1.2.2. Any Flow, Groups or Data items with NGC as part of the name should not be changed.	SAA	Many
National Grid company, NGC	Changes on a case by case basis	SVAA	Many
NGC, National Grid company	Changes on a case by case basis	TAA	Many
NGC, National Grid	NGC NGET, National Grid Electricity Transmission Company	Website	

g) Other Code Subsidiary Documents

NGC	NGC the Transmission Company	ISRA Management Guide	
NGC	NGC the Transmission Company	ISRA Technical Spec	

ANNEX 5 REFERENCES NOT BEING CHANGED

These references have not changed because they are flow names, group names, data items or acronyms.

Reference
NGC BM Unit Name
NGC Zone
TMELNGC
IMBALNGC
MELNGC
NGC Standing Data Report (CRA – I028)
NGC Filename
NGC File header
NGC BM Identifiers
NGC030
NGCSPEC
NGC32