



Grampian House  
200 Dunkeld Road  
Perth  
PH1 3GH

John Bradley  
UNC Modification Panel Secretary  
Joint Office of Gas Transporters  
Ground Floor Red  
51 Homer Road  
Solihull  
B91 3QJ

E:mail: [Jeff.Chandler@scottish-southern.co.uk](mailto:Jeff.Chandler@scottish-southern.co.uk)

Our Reference:  
Your Reference:

Date : 30 April 2010

Dear John,

### **Modification Proposal 0286**

Thank you for providing SSE, with the opportunity to comment on the above Modification Proposal.

SSE is not supportive of proposal 0286.

SSE welcomes a greater role for Panel consumer representation, including the extension of Consumer Representative voting rights. However, the SSE believes that ideally, reform of Consumer Representative voting rights within the UNC should be the subject of much fuller debate between all interested parties, since a simple extension of voting rights could have far reaching implications.

Issues include:

- Impacting the prevailing balance in respect of permitting a Competition Commission appeal;
- Whereas the National Consumer Council (NCC) may be judged to be impartial, current arrangements would permit the NCC to appoint consumer representatives other than NCC, who may be strongly aligned to a particular market sector;
- The questionable need for appointed Consumer Representatives to have voting rights on matters of UNCC business; and
- The questionable need for Consumer Representatives to have voting rights in respect of anticipated Self-Governance proposals.

Please do not hesitate to contact me if you wish to discuss this further.

Yours sincerely

Jeff Chandler  
Head of Fuel Strategy  
Energy Strategy