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Date : 16 April 2010

Dear John,

### **Modification Proposal 0279**

Thank you for providing Scottish and Southern Energy plc (SSE) with the opportunity to comment on the above Consultation.

SSE is supportive of Proposal 0279.

SSE recognises the significant value of meter asset and meter reading data in the management of supply points both for shippers and suppliers and recognises the disadvantage that a new shipper or supplier has, compared to the incumbent, until a more extensive history is acquired over time.

SSE acknowledges that one such disadvantage relates to the verification of xoserve calculated AQ values and specifically those which have used meter reading history obtained by the previous supplier. This is particularly relevant to supply point AQ's which may result in the supply point crossing a defined AQ threshold.

For these reasons SSE believes that the implementation of the modification better facilitates the relevant objective:

*Standard Special Condition A11.1 (d): so far as is consistent with subparagraphs*

*(a) to (c) the securing of effective competition:*

*(i) between relevant shippers;*

*(ii) between relevant suppliers; and/or*

*(iii) between DN operators (who have entered into transportation*

*arrangements with other relevant gas transporters) and relevant shippers;*  
and agrees with the draft Modification Report.

SSE agrees that the proposed report be a User Pays service and are comfortable with the cost allocation. The report may be required more frequently than annually to maximise benefits.

SSE notes that the modification will give the relevant Transporter permission to release meter read history and meter asset information to the current shipper in general. Although the modification has highlighted the benefits of this for AQ management, SSE recognises that the history can be utilised to identify and remedy data discrepancies at a much earlier stage. This will ultimately bring cost and service benefits to transporters, shippers, suppliers and consumers through improved data accuracy, identified earlier than has previously been possible. So, if implemented, this modification will bring additional advantageous opportunities.

Therefore, SSE fully supports the implementation of this modification.

Please do not hesitate to give me a call if you wish to discuss this further.

Yours sincerely

**Anne Jackson**  
Retail Gas Business Manager  
(via email)