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Modification Panel Secretary
Joint Office of Gas Transporters
First Floor South
31 Homer Road
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West Midlands
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16 April 2010

Dear John

Re: Modification Proposal 0279: Improving the availability of meter read history and asset information.

Thank you for providing Scotia Gas Networks with the opportunity to comment on the above Modification Proposal. SGN fully supports implementation of Modification Proposal 0279.

This Modification Proposal aims to provide visibility of meter reads and meter asset information to an incoming shipper in order to accurately amend the AQ. This information is not currently visible to the incoming shipper. Analysis based on 2009 annual AQ process has shown that around -30% of potential revisions to AQs were not able to be progressed due to the incoming shipper not having access to this information.

SGN would agree with the proposer that implementation of the Proposal may improve the Annual AQ Review, Change of Supplier AQ appeal and the USRV (Filter Failure). Furthermore, by enabling incoming shippers to have access to meter read history and meter asset information thus improving the ability to more accurately complete the AQ Review, SGN believe this would better facilitate relevant objective Standard Special Condition A11.1(d) so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition.

SGN understand the implementation, development and on-going annual costs associated with this Proposal are to be recovered from Shippers. Although implementation would have been preferred before or during the 2010 AQ Review, this will not be possible as the Rough Order of Magnitude indicates a lead time of 16-24 weeks.

Yours sincerely

Bali Dohel



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