



Scotia Gas Networks,
St Lawrence House,
Station Approach,
Horley,
RH6 9HJ

Modification Panel Secretary
Joint Office of Gas Transporters,
First floor South,
31 Homer Road,
Solihull,
West Midlands,
B91 3LT

04 February 2011

Dear Bob,

Re: Modification Proposal 0341, Manifest Errors in Entry Capacity Overruns

Thank you for providing Scotia Gas Networks with the opportunity to comment on the above Modification Proposal. SGN **does not** support implementation of Modification Proposal 0341.

This Modification Proposal has been raised by GasTerra and seeks to introduce Manifest Error provisions into the UNC where a User error in booking entry capacity has led to entry capacity overrun charges being incurred. Under this proposal, a User could raise a claim for manifest error, have it considered by the UNCC, and where the claim is found to be valid, the UNCC would determine an appropriate adjustment to the overrun charges.

The proposal also introduces a limited element of retrospectivity for errors that have occurred since 1st April 2010.

Whilst Scotia Gas Networks supports the principles of the Modification for Manifest Error provision, we are of the opinion that allowing retrospective changes to the rules sets a precedent for changes in other as yet undefined areas of the UNC.

In determining the outcome of any Manifest Error it may be more appropriate, given the commercial impact, for an independent expert to be utilised rather than the UNCC panel where the level of knowledge of some members may be limited in this field. It may also be prudent to implement warning systems prior to any Manifest Error becoming protracted. This will require further discussion with the appropriate Transporter to determine the viability and costs associated with up dating any systems.



We hope you find these comments helpful.

Yours sincerely

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Scotia Gas Networks

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