

Representation

Draft Modification Report

0339 0339A – (Alternative to Mod 0339), Clarification of the AUG Year in respect of UNC Modification 0229

Consultation close out date: 14 February 2011

Organisation: **Scottish and Southern Energy PLC**

Representative: Mark Jones

Date of Representation: 14 February 2011

Do you support or oppose implementation of 0339 or 0339A?

0339 -Support

0339A -Support

Please summarise (in one paragraph for each) the key reason(s) for your support/opposition.

Implementation of Modification 0229 recognised the fact that a cross subsidy exists between the LSP and SSP market sectors. From the initial starting point of the development of modification 0229, a significant amount of time has elapsed and it is, therefore, important that this cross subsidy exists for as short a time as possible. We, therefore, support the modification which allocates costs and risks between the LSP and SSP market sectors on a more correct and equitable basis at the earliest opportunity. Due to the amount of time that has elapsed on the whole suite of modifications and development work in this area, the LSP sector has had sufficient time to build any associated costs into tariffs.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

Relevant Objectives:

How would implementation of either modification impact the relevant objectives?

We agree with the proposer that relevant objective (f) will be met

Impacts and Costs:

What analysis, development and ongoing costs would you face if either modification were implemented?

No Impact

Implementation:

What lead-time would you wish to see prior to these modifications being implemented, and why?

Either of these modifications could be implemented immediately.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

NB: while formal legal text has not been provided, Suggested Text has been included in the modification and comments on this will be helpful when the text is finalised.

Which modification do you prefer?

Please provide details if you have a preference for the implementation of either Modification 0339 or 0339A

Prefer 0339A as it addresses the issue of cross subsidy sooner

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

No further comments