

**Representation For. 0045**  
"Provision of Available Interruption Information"  
Version 2.0

**Date of Communication:** 12/09/2005  
**External Contact:** Katherine Marshall (Scottish And Southern Energy plc)  
**Slant:** For  
**Strictly Confidential:** No

**Abstract**

Grampian House  
200 Dunkeld Road  
Perth  
PH1 3GH  
Email: [katherine.marshall@scottish-southern.co.uk](mailto:katherine.marshall@scottish-southern.co.uk)

12 September 2005

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

Dear Julian

**Draft Modification Report: 0045: Provision of Interruption Information**

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

As requested, we have structured our response to match the headings in the report.

**1. The Modification Proposal**

SSE is generally supportive of developments that seek to enhance information provision between UNC parties to the benefit of the economic and efficient operation of the system. Our understanding is that this proposal would ensure that Transco NTS continues to receive accurate and timely information from the DNOs, which would improve its operational decision-making process.

**2. Extent to which implementation of the proposed modification would better facilitate the relevant objectives**

We agree with the proposer that if implemented the proposal would better facilitate the following relevant objectives:

- "Standard Special Condition A.11.1(a) the efficient and economic operation of the NTS pipeline system" by enabling operational capacity management decisions to be taken on the basis of more accurate information; and
- "Standard Special Condition A.11.1.(b) the co-ordinated efficient and economic operation of the combined pipeline system and the pipeline system of one or more other relevant gas transporters" improving the timeliness and accuracy of information will benefit all Transporters.

As a result of the above we would also expect there to be associated benefits for gas shippers and customers, as operational and emergency decision-making by all transporters would be well-informed and more efficient.

**3. Implications of implementing the Modification Proposal on security of supply, operation of the Total System and industry fragmentation**

We consider implementation of the proposal would be beneficial to security of supply and the operation of the Total System as the Transporters will be able to make efficient operational decisions on their respective networks. This will enhance their ability to meet all reasonable demand for gas thereby satisfying their licence (Standard Special Conditions A17 and A9) and statutory obligations.

**4. The implications for Transporters and each Transporter of implementing the Modification proposal**

The proposer makes reference to the "Interruption Manager" system, which prior to Network Sales was used by the integrated Transco. We presume that any systems implications arising from implementing the proposal will have been investigated and assessed by the Transporters.

**7. The implications of implementing the Modification Proposal for Users**

We do not believe that should be any additional risks or costs for Users associated with implementing the proposal.

**8. The implications of implementing the Modification Proposal for Consumers etc**

Implementation of the proposal ought to provide greater certainty for consumers that DN interruption initiated by Transco NTS will be called on the basis of accurate and timely information.

**10. Advantages of the proposal**

We agree with the advantages advocated by the proposer for the Transporters.

**Summary**

In summary, SSE confirms its support for implementation of the proposal.

I hope that our comments have been helpful. Please do not hesitate to contact me in the first instance if you wish to discuss any of the points raised in our response.

Yours sincerely

Katherine Marshall  
Market Development