

Tim Davis Modification Panel Secretary Joint Office of Gas Transporters Ground Floor Red 51 Homer Road Solihull B91 3LT

> 0141 568 4537 marie.clark@scottishpower.com

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(Send by email)

Dear Tim

Allocation of Unidentified Gas Statement – 1st Draft of Statement 2013/14

We welcome the opportunity to respond to the 1st Draft of the AUG Statement for 2013/14. Our response is non-confidential and therefore can be posted on the Joint Office website.

ScottishPower will continue to be proactively engaged with the AUGE in the development of the AUG Statement for 2013/14. We understand that for this AUG Year, the AUGE intend to review and further develop the methodology which is used to calculate the volume of unidentified gas and the level of contribution which should be assigned against the Larger Supply Point and Smaller Supply Point market sectors. We support this intention and the continued refinement of the methodology and statement as more information becomes available and as additional issues are brought to the attention of the AUGE.

ScottishPower firmly support the principle that the Gas Industry should be permitted to highlight potential areas of risk to the AUGE that would benefit from further clarification and issues that require more detailed consideration and analysis in order to determine if they are actively contributing to the level of unidentified gas which exists in the Industry.

Energy UK has developed a collective response to the 1st draft of the AUG Statement for 2013/14. We support the intention of this approach and the work undertaken by Energy UK to collate the views and suggestions of its members. ScottishPower has contributed significantly to this response and has outlined specific issues which we believe are worthy of further investigation by the AUGE. We have attached an appendix listing the particular issues that we believe are worthy of further investigation.

Cathcart Business Park, Spean Street, Glasgow G44 4BE Tel: 0141 568 3930 www.scottishpower.com



We look forward to continued engagement with the AUGE and believe that the process would be further enhanced by additional meetings involving interested parties to discuss and review progress of the draft AUG Statement.

If you require any further information on the issues raised by ScottishPower, please do not hesitate to contact me on the above telephone number.

Yours sincerely

Marie Clark Energy Commercial Manager ScottishPower

Cathcart Business Park, Spean Street, Glasgow G44 4BE Tel: 0141 568 3231 Fax: 0141 568 3050 www.scottishpower.com