

Representation For. 0022

"Revision to Section O - Removal of references to the Base Plan Assumptions Document"
Version 1.0

Date of Communication: 20/07/2005
External Contact: Katherine Marshall (Scottish And Southern Energy plc)
Slant: Comments
Strictly Confidential: No

Abstract

Re: Draft modification report 0022: Revisions to Section O - Removal of References to the Base Plan Assumptions Document

Thank you for providing Scottish and Southern Energy plc with the opportunity to comment on the above draft modification report. Unfortunately SSE has missed the consultation deadline due to the high volume of work at present, however I hope that our comments can be taken into account.

SSE notes that the aim of the proposal is to replace the provisions in the UNC relating to the Base Plan Assumptions (BPA) with references to the Transporting Britain's Energy process. We are aware that Transco NTS has repackaged the BPA process and renamed it "TBE" and therefore it seems sensible to modify the UNC to take account of this. We are also supportive of the change to the timetable by making the start date for the consultation January and not October.

However, we are unclear how the current provisions of TPD Section O will affect us as a shipper/supplier in terms of the information that we will be required to provide to both Transco NTS and the other Transporters. Under the integrated Transco we provided one response to the TBE process yet the provisions of TPD Section O seem to suggest that we will be required to provide 5: one to Transco NTS and four to the DNOs. This would seem to be a more onerous obligation to place on shippers and not necessarily efficient. Our understanding during the development of the UNC earlier in the year was that the Transporters would cooperate with each other and this is our interpretation of the relevant licence obligations placed on the Transporters with regard to the production of their long-term development statements. We would therefore welcome some clarification as to the obligations that TPD Section O places on shippers. In addition, we are not certain that the amendments to Section O dovetail with the provisions of Section H of the OAD on the Transporters and believe that this also needs to be examined.

On this basis we offer the proposal qualified support.

As a more general point we believe that some of the concerns that we have raised above would have been addressed if the draft modification report had contained a more comprehensive explanation of the respective obligations that fall on all UNC parties.

I hope that our comments have been helpful. Please do not hesitate to contact me if you wish to discuss the points we have raised in more detail.

Yours sincerely

Katherine Marshall
Market Development