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Modification Panel Secretary
Joint Office of Gas Transporters
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02 January 2007

Dear Julian,

Modification Proposal: Mod 0124: Amendment to the window for acceptance of Meter Reads by the Transporter.

Thank you for providing SGN with the opportunity to comment on the above Modification Proposal. SGN support this proposal.

SGN agree with the principals set out in this proposal. It appears to be relatively straightforward and not too onerous to implement.

We believe changing the parameters and enabling 100% of validated Meter Reads to be submitted by the 15th Business Day after the Meter Read date and 50% of reads to be submitted by the 10th Business Day after the Meter Read date, it should increase the potential for valid and accurate meter readings to be submitted and used in the allocation of energy and transportation charges between Users. This should improve cost reflectivity and ultimately better facilitate competition. The proposal should also help reduce the number of Must Reads that need to be undertaken by Transporters; as such we believe this should help improve the efficiency of the current processes.

We note that details have not been provided in relation to the potential number of additional readings that might be submitted under such arrangements; as such it is difficult to quantify the potential benefit.

Although it is anticipated that system changes will be minimal, further work needs to be undertaken by xoserve to clarify impact, potential cost and implementation timescales; at this stage it is anticipated that implementation will take 4 -5 months.

We hope you find these comments helpful.

Yours sincerely

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