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Modification Panel Secretary
Joint Office of Gas Transporters
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Dear Julian,

Modification Proposal: 0180: Replacement of file formats contained within Annex A Part 7 of the LDZ CSEP NExA.

Thank you for the opportunity to comment on this Modification Proposal. Scotia Gas Networks fully supports the principle behind this Modification Proposal but can not support implementation as it currently stands for the reasons set out below.

The current version of the NExA does not contain file formats which reflect those in use by iGTs and DNOs. This Modification Proposal was raised to replace the contents of Annex A Part 7 with new file formats which reflect current practice. File formats pertaining to the CSEP NExA have been widely discussed within the Ofgem facilitated groups looking at issues associated with the CSEP NExA. This proposal sought to align the NExA with current practice and improve overall efficiency. Additional detail was also provided to add clarity, compared to that set out in NExAs currently. SGN believes such a proposal could better facilitate the relevant objective A11.1(f) ensuring prompt, accurate and timely transfer of information between DNOs, iGTs, xoserve and Shippers and improving overall efficiency of arrangements. However at the time of responding we note that a Variation request has been raised by the Proposer to correct an error in Modification Proposal 0180. We believe the variation is material. The variation is due to be considered by the Modification Panel next week. As such we are unable to support implementation of Modification Proposal 0180. We hope improvements in this area can be progressed promptly under Modification Proposal 0180V.

We hope you find these comments helpful.

Yours sincerely

Bali Dohel
Network Officer