



Julian Majdanski
Modification Panel Secretary
Network Code Development
51 Homer Road
Solihull
West Midlands B91 3LT

09 November 2007

0141 568 2464

0141 568 4909

Dear Julian,

The following is the Scottish Power response to the recent urgent modification

Modification Proposal 0181 (Urgent) - Scheduling Charges calculation for Gas Flow Days 22, 23, 24, 25 & 26 October 2007

Thank you for allowing us to respond to this modification.

Scottish Power does not support UNC modification 0181

This modification seeks to introduce a mechanism to remedy one aspect of the consequences of the Gemini failures. It is quite clear that varying levels of support were available to affected parties and in some cases the relevant contingency arrangements were not communicated effectively. We also don't believe that the contingency arrangements are optimal.

However, the most important thing for us is that robust and agreed contingency arrangements are put in place for such eventualities in future, with full consultation. We would be concerned in setting a precedent with this modification. It is difficult for us to see how it would further the relevant objectives and we would be reluctant to support anything which effectively proposed a "smear" across industry participants, regardless of financial significance.

Should you have any queries on the views expressed, please contact me on the telephone number as shown.

Yours Sincerely,

A handwritten signature in blue ink that reads "Steven Gordon".

Commercial & Regulation Manager (Gas)
Scottish Power Energy Wholesale