



2 Leasons Hill
Orpington
Kent
BR5 2TN

Direct Tel: 01689 886780
Email: Bali.dohel@scotiagasnetworks.co.uk

Modification Panel Secretary
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
Solihull
West Midlands
B91 3QJ

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Dear Julian,

Modification Proposal: 0183 Provision of Data in respect of downstream networks by the iGT directly connected to the Distribution Network.

Thank you for the opportunity to comment on this Modification Proposal. Scotia Gas Networks fully supports implementation of the proposal. We believe it would address a significant gap in current industry arrangements.

Following detailed discussion in the Ofgem led meetings iGTs have stated that there are currently no contractual arrangements in place between iGTs in respect of nested CSEPs and no arrangements to collate and pass on key Supply Point information. This means that information requirements and obligations referred to in Annex A of the CSEP NExA are not currently replicated for nested CSEPs. This proposal seeks to modify Annex A of the CSEP NExA to clarify that the iGT directly connected to the DN is responsible for the provision of all such relevant data in respect of any network whether directly connected to the DN or downstream of the iGT.

SGN believes this Modification Proposal provides additional clarity, and if implemented would greatly improve overall efficiency of current arrangements.

SGN believes this proposal would better facilitate the relevant objective A11.1(f) by ensuring prompt, accurate and timely transfer of essential information between DNOs and the lead iGTs. It would ensure DNs had access to accurate and timely information regarding gas demand at the DN offtake and hence greatly enhance planning and operation of the network. SGN also believes the provision of such information would also have significant benefits to customers and competition by improving accuracy of the RbD process.

In addition to the comments made above, SGN also agrees with the comments made by the Proposer, that this Proposal should also deliver significant benefits for iGTs as such information must be required by iGTs to ensure compliance with connection arrangements and the CSEP NExA. It would allow iGTs to:

- monitor demand downstream of the offtake with the DN and ensure the maximum offtake capacity and offtake rate are not exceeded
- to ensure suitable pressures are maintained and provided to consumers on the iGT networks.

As obligations on Shippers under the UNC and iGTs under the CSEP NExA are absolute, we believe obligations on iGTs in relation to nested CSEPs relating to the provision and update of such information should also be absolute. It would then be up to iGTs to ensure that contractual arrangements put in place for nested CSEPs reflect these obligations so that there is no deterioration in the level of service or accuracy of information for nested CSEPs.

It is recognised that lead iGTs may need to develop processes and contractual arrangements to support these obligations. We suggest implementation should be no later than 6 months following direction by the Authority. However given significant implications for the industry we believe implementation should be sooner where possible.

We hope you find these comments helpful

Yours sincerely

Bali Dohel
Network Officer