



Perrie Street
Dundee
Angus
DD2 2RD

Modification Panel Secretary
Joint Office of Gas Transporters
First Floor South
31 Homer Road
Solihull
West Midlands
B91 3LT

17 April 2008

Dear Julian,

Modification Proposals: 0185VV Meter Error Notification Process.

Thank you for providing the opportunity to comment on Modification Proposal 0185VV. Scotia Gas Networks supports implementation of this Modification Proposal. SGN believes concerns raised in response to Modification Proposals 185/185A have been addressed. Furthermore, legal text provided now adds clarity and fully reflects the principles of the proposal.

We believe implementation of this proposal will better facilitate relevant objectives as specified under Standard Special Condition A11.1(d) and A11.1(f). By formalising arrangements, improving transparency and involving parties from an early stage, this should reduce potential for ambiguity and allow parties to better manage the impact of any measurement error. It should also reduce the potential for disputes. As such we believe it should help improve efficiency in implementation and administration of the UNC and related processes and help facilitate competition.

SGN notes the proposal follows lengthy industry discussion. SGN believes the proposed arrangements set out in legal text for the UNC and OAD, along with the proposed UNC Related Document are sufficiently robust and pragmatic. We believe implementation will allow the industry to move forward in a consistent and appropriate manner.

We believe approximately 4 months should be allowed for implementation. This will give parties time to set up necessary reporting and communication arrangements and allow time to form a list of appropriate experts.



We hope you find these comments helpful.

Yours sincerely

Beverley Grubb
Commercial Manager
Scotia Gas Networks
Direct Tel: 01382 613037
Mobile: 07817 215077
Email: Beverley.grubb@scotiagasnetworks.co.uk