



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

Date
7 February 2008

Contact/Extension
0141 568 4492

Dear Julian

Modification Proposal 0190 Clarification of Aggregation of Credit Positions using a Guarantee from a Security Provider

Thank you for the opportunity to comment on the draft Modification Report prepared in respect of this Proposal.

ScottishPower supports this modification and the proposed implementation date.

ScottishPower believes the proposal is reasonable. It provides more clarity and a greater opportunity for parties to post appropriate levels of security in a cost effective manner, whilst at the same time bringing the UNC more into line with Ofgem's Best Practice Guidelines.

As such we are satisfied that this proposal facilitates Standard Special Condition A11.1 (d) – the securing of effective competition between relevant shippers, and reduces any possible barrier to entry.

Please contact me if you have any queries on the above.

Yours Sincerely,

Gerry Hoggan
Regulation Compliance Manager

ScottishPower Energy Management, 4th Floor, Cathcart Business Park, Spean Street, Glasgow G44 4BE
Telephone 0141 568 2983 Fax 0141 568 4464

ScottishPower Energy Management Limited Registered Office: 1 Atlantic Quay, Glasgow G2 8SP
Registered in Scotland No. 215843 Vat No. BG 659 3720 08