

Julian Majdanski
UNC Modification Panel Secretary
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Dear Julian

Modification Proposal 0192

Thank you for providing Scottish and Southern Energy plc (SSE) with the opportunity to comment on the above Modification Proposal.

SSE supports the implementation of this Modification Proposal.

Modification Proposal 0192 was raised as a result of discussions that took place within Review Group 0158. During these discussions a number of options were considered in order to ensure that USRVs were not timed out as a result of the Implementation of Modification Proposal 0152v.

We believe that 30 months is an appropriate timescale to allow the User to resolve a USRV, and it will give the DNOs' agent sufficient time, in a vast majority of cases, to resolve the USRV prior to at least part of the period covered by the USRV from timing out. It is worth mentioning that this timescale does not give assurance that no USRVs will at least partly time out, as the start period for a USRV could be quite some time in the past, but historical evidence suggests that the numbers which will time out inside the 30 month time limit should be small.

SSE considers the User Pays mechanism to be an appropriate method of cost recovery for this service.

SSE believes that this modification proposal will better facilitate Standard Condition A11.1 (d), as it will lead to a more accurate allocation of energy and transportation charges to each User, and so reduce the inaccuracies and uncertainties within the RbD mechanism. It will also improve overall data quality.

We can see no disadvantages with this Modification Proposal.

Yours sincerely,

Mark Jones