



St Lawrence House  
Station Approach  
Horley  
Surrey  
RH6 9HJ

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

12 September 2008

Dear Julian,

**Modification Proposal: 0199 Clarification around the application of the UNC Dispute Resolution Process.**

Thank you for the opportunity to comment on the above Modification Proposal. Scotia Gas Networks plc does not support the proposal and would like to provide the following comments.

This Modification Proposal has been raised to amend UNC GT Section A 1.1.2 (a). The proposer believes the suggested amendment would provide further clarity as to whether Invoice Items are subject to the query process as defined in Section A. SGN considers this amendment to be unnecessary and believes that in making these change the provision may be construed as ambiguous; casting doubt over whether or not the Framework Agreement, Ancillary Agreement and the Supplemental Agreement were in fact intended to be included within this definition. Therefore, we believe that by incorporating the additional text, the amendment would render the existing provision unclear. In any event, the proposed amendment is implied within the existing provision. Accordingly, we do not believe that it facilitates the relevant objective A11.1 (f) the promotion of efficiency in the implementation and administration of the Network Code.

We hope you find these comments helpful.

Yours sincerely

Bali Dohel  
Commercial Assistant  
Scotia Gas Networks plc  
Direct Tel: 01689 886780  
Mobile: 0787 9434 113  
Email: Bali.Dohel@scotiagasnetworks.co.uk