

Julian Majdanski
UNC Modification Panel Secretary
Joint Office of Gas Transporters
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6th June 2008

Dear Julian

Modification Proposal 0211

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.

The current RbD Audit has been largely unchanged since it was introduced, and the main purpose of the audit has been each year to check that the calculations being performed by the RbD process are being done correctly, together with performing some very limited feeder process audits. The calculations being performed have not changed since they were introduced, and so each year the same calculation process is being checked, and it has been recognised within various discussions at RbD Audit Sub Committee meetings that there is a substantially bigger risk in the derivation of the figures that go into the calculation processes. Due to this a far wider ranging audit is required, in order to gain confidence that data within the gas settlement process is correct.

For this reason it is sensible to suspend the current audit process, and for the industry to look to develop proposals for a far wider ranging audit to check areas that have either not been audited, or been the subject of very limited audits. This modification proposal allows the current RbD Audit to be reintroduced in its current format if necessary. This Modification Proposal will further Special Condition A11.1 (f) – the promotion of efficiency in the implementation and administration of the UNC, by reducing costs to the industry of the audit and the time spent by industry participants within the process.

Yours sincerely,

Mark Jones