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Date : 5 Dec 2008

Dear John,

Modification Proposal 0219 – Publication of GB Wholesale Gas Market Liquidity Data

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

SSE is supportive of proposal 0219.

SSE believes that information regarding the liquidity of gas wholesale markets should be made easily available in the public domain. This will help co-operate with the recent recommendations of the Energy Supply Probe. Failure to do so might be interpreted that the wholesale market is not as efficient as it could be. It is important that we report the level of trading as liquidity is required for an efficiency market and we believe the UK gas market is one of the most liquid in the world.

The industry should endeavour to make the information as easy to interpret as possible. This will then save the time of customers and other interested stakeholders who are not in the privileged position of having dedicated resources to analyse the wholesale market.

On balance SSE believes that the proposal will better facilitate the relevant objectives of Standard Special condition A11.1 (f): of efficiency in the implementation and administration of the network code; implementation will provide an easy to interpret measure of the liquidity of the GB gas market which will provide an indicator as to the health of the market

Please do not hesitate to give me a call if you wish to discuss this further.

Yours sincerely

Jeff Chandler
Gas Strategy Manager
Energy Strategy