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

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Dear John,

Modification Proposal: 0222 Amendment of Interconnector UK's Minimum Wobbe Limit.

Thank you for the opportunity to comment on Modification Proposal 0222. Scotia Gas Networks fully support the implementation of this proposal.

IUK have raised a concern that the minimum Wobbe Indexes set out in the Network Entry Provisions/Network Exit Provisions (NEPS) of their Interconnection Agreement are higher than the GSMR minimum (GSMR state it to be between 51.41 and 47.2 MJ/m³). IUK believe this leads to constraints on volumes of gas available to be entered or offtaken from the NTS.

SGN agree with the proposer that by reducing the minimum Wobbe Indexes within IUK's NEPS to the minimum set out in GSMR of 47.2 MJ/m³ it will bring the requirements at IUK in line with the majority of other ASEPs and NTS Exit Points. This will, therefore, enhance effective competition as it would lead to consistency between sites. Furthermore we believe implementation of this proposal may enhance security of supply as it would remove potential barriers to the transfer of gas from Europe.

We hope you find these comments helpful.

Yours sincerely

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