



St Lawrence House
Station Approach
Horley
Surrey
RH6 6HJ

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: 0226: Additional Data Requirements for the Administration of CSEP Supply Points.

Thank you for providing Scotia Gas Networks with the opportunity to respond to Modification Proposal 0226. SGN is in support of this Modification Proposal.

This proposal has been developed following industry discussions within Review Group 157 'Review of iGT Settlement and Reconciliation Arrangements'. The Review Group involved Large Gas Transporters (GTs), Independent Gas Transporters (iGTs) and User representatives. A number of contributing factors were identified relating to discrepancies between the number of Connected System Exit Point (CSEP) Supply Points registered on independent Gas Transporter (iGT) and Distribution Networks Operator (DNO) records respectively.

In order to address this anomaly Modification Proposal 0226 seeks to introduce the use of a unique data item, namely the DNO Reference number. It is proposed that the iGT is to use this number when submitting their D01 new Logical Meter Number Request to xoserve, this will enable xoserve to identify a specific connection with the relevant DNO Reference Number. We understand a trial was undertaken by some iGTs where they provided the DNO Reference number in the 'free text' field. This exercise proved to be successful as manual checks against the DNO Reference Number enabled xoserve to quickly identify the correct connection.

This proposal has been developed following lengthy industry discussions involving all stakeholders and has also been presented at key industry forums where it has received good support with no specific issues having been raised.

SGN consider implementation of the above proposal is essential to allow the industry to move forward, we believe it will provide a basis to significantly improve anomalies in User's Supply point count between DNO and iGT records as the proposal offers a pragmatic solution to historical problems associated with these discrepancies.

For the reasons provided above SGN consider implementation of this proposal is expected to facilitate Standard Special Condition A11.1 (f) of the GT Licence; so far as is consistent with subparagraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.



We hope you find these comments helpful.

Yours sincerely

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