



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

11 December 2008

Dear John

Modification Proposal: 0238 Amendment to Protected Information Provision to facilitate DNO compliance with SPAA Schedule 23.

Thank you for providing Scotia Gas Networks with the opportunity to respond to Modification Proposal 0238. Scotia Gas Networks fully supports the implementation of UNC Modification 0238.

National Grid Distribution have raised this Modification proposal to introduce a further exception to the Protected Information provisions in Section V5.5 of the UNC to include gas Suppliers and other organisations

DNOs are required to adhere to obligations detailed in Schedule 23 of the Supply Point Administration Agreement (SPAA) as specified in Standard Licence Condition A14, which require Suppliers and other organisations to access protected information for the purposes of change of supplier activities. Further to this obligation Standard Special Licence Condition A31 requires DNOs to provide a supply point administration service which is currently satisfied through the provision of the Internet Access to Data (IAD) system which in turn is provided as a Non-Code User Pays service via the Transporters' agent.

Section V5.5 of the UNC TPD currently specifies organisations which may be provided with protected information of which gas Supplier organisations and other organisations are not currently specified. As SPAA is a Supplier to Transporter agreement, recent discussions have highlighted a possible conflict between UNC TPD V5.5, A14, A31 and ultimately Section 105 of the Utilities Act as only gas Shipper organisations are detailed as parties able to access protected information. Amendment to the Protected Information provisions to include Supplier and other organisations would help clarify this apparent discrepancy.

SGN agree with the proposer that the inclusion of Suppliers and other organisations within section V5.5 of the UNC TPD will further facilitate SSC A11.1 (c) "so far as is consistent with subparagraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence"



We hope you find these comments helpful.

Yours sincerely

Joel Martin
Scotia Gas Networks
Direct Tel: 0131 5596024
Email: joel.martin@scotiagasnetworks.co.uk