



## **Modification Proposal 239 – Reinstatement of NTS Interruption Comments from AEP<sup>1</sup>**

The Association welcomes the opportunity to comment on this draft modification report. We support the proposal.

We recognize that this proposal is only necessary since the legal drafting associated with Mod 90 “Revised DN interruption arrangements” removed NGG’s rights to interrupt NTS and DN supply points with effect from October 2011. Whereas the intention of Mod 90 was only to remove the right to interrupt DN Supply Points, leaving NTS interruption to be considered as part of enduring exit reform.

Absent approval of this modification proposal NGG may need to utilize other means in order to meet peak day transportation requirements from October 2011, these may include capacity buy-backs, operating margins or investment. These alternatives may be less efficient than retaining interruption rights for NTS Supply Points as proposed. Therefore this proposal will facilitate the efficient and economic operation of the system as per SSC A11.1(a).

January 9, 2009

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<sup>1</sup> The Association of Electricity Producers (AEP) represents large, medium and small companies accounting for more than 95 per cent of the UK generating capacity, together with a number of businesses that provide equipment and services to the generating industry. Between them, the members embrace all of the generating technologies used commercially in the UK, from coal, gas and nuclear power, to a wide range of renewable energies.