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Modification Panel Secretary
Joint Office of Gas Transporters
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31 Homer Road
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Dear John

Modification Proposal: 0241 Delaying the implementation of the Ad-hoc application principle of the enduring Offtake arrangements.

Thank you for providing Scotia Gas Networks with the opportunity to respond to Modification Proposals 0241. SGN fully support implementation of this proposal.

Implementation of 195AV would currently allow the Ad hoc Applications to be made from 01.04.09. Modification proposal 0241 aims to delay the start of the Ad-hoc application window from 01.04.09 to 01.10.09 in order for a number of procedures / documents to be in place prior to capacity being applied for and to allow for the ExCR Methodology Statement to be approved. This change would prevent the Ad hoc applications being made prior to the ExCR being approved and prior to Users knowing their Initial Holdings.

We believe the arrangements set out in this proposal represent a simple and pragmatic solution to a unique situation and would bridge the gap that would exist without these sanctions being in place following the Authority's decision to direct implementation of Modification Proposal 0195AV. They do not seek to amend current arrangements in any way but simply allow for the Ad hoc application to be changed for this year only.

SGN agrees with comments made by National Grid NTS that implementation of this modification proposal better facilitate the relevant objectives

We hope you find these comments helpful.

Yours sincerely



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