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Dear John,

Modification Proposal 0242 -Changes to the window for the submission of Valid Meter Readings

Thank you for providing Scottish and Southern Energy plc (SSE) with the opportunity to comment on the above Modification Proposal.

SSE is supportive of proposal 0242.

The proposal is to amend Section M 3.3.4(b) to require Users to submit 100% of Meter Reads by the 25th Business Day after the Meter Reading date. This will allow a much higher proportion of Valid Meter Readings to be accepted by Transporters and this in turn will improve the accuracy of the allocation of energy through the reconciliation process.

It would also provide for a greater number of Meter Readings to be accepted for purposes of setting Annual Quantities (AQ) which itself will improve the accuracy of deeming volumes of energy at supply points.

SSE also understands that no changes are to be made to the timescale within which the first 50% of reads are to be submitted and this will remain at 10 Business Days.

SSE believes that the proposal will better facilitate the relevant objectives of Standard Special condition A11.1 (d) the securing of effective competition:

By providing a greater number of Valid Meter Readings to be accepted by the Transporters this should:

- improve the accuracy of the allocation of energy through the reconciliation process;
- provide for a greater number of Meter Readings to be accepted for the purposes of setting Annual Quantities (AQ);
- improve the accuracy of deeming volumes of energy at supply points.

By facilitating acceptance of more Valid Meter Readings, implementation would facilitate more accurate allocation of energy and transportation charges between Users. This would

permit improved targeting of energy balancing charges and increase the cost reflectivity of Transportation Charges.

Please do not hesitate to give me a call if you wish to discuss this further.

Yours sincerely

Jeff Chandler
Gas Strategy Manager
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