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Modification Panel Secretary
Joint Office of Gas Transporters
First Floor South
31 Homer Road
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05 November 2009

Dear John

Modification Proposal: 0255 - Publication of Objection Rates for LSP Supply Points.

Thank you for providing Scotia Gas Networks (SGN) with the opportunity to respond to Modification Proposal 0255. SGN does not support the implementation of this Modification Proposal.

Currently the objection process as detailed UNC Section G 2.8 is in place to enable Users to object to a Supply Point transfer detailing the reason for the rejection. This process enables Users from having to re-nominate a site to return it to the correct portfolio where an error has occurred. There is a concern that this process can be manipulated in so much as it affords Users the opportunity to retain customers, as opposed to correcting incorrect transfers. It is SGN's opinion that implementation of UNC Modification 0255 would serve only to highlight Users with a higher rate of objections subsequently cancelled and not where any inappropriate behaviour was being displayed.

In relation to the definition of the Modification Proposal as not User Pays we do not agree with the proposer's view that the costs associated with implementing the Modification should be met by Transporters. Although the initial Transporter Agency analysis indicates costs associated with the formulation of a report to be minimal SGN believe the costs should be attributable to the relevant organisations that may benefit from the Modification's implementation, which in this case would fall to Users.

We hope you find these comments helpful.

Yours sincerely

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24 hour gas escape number 0800 111 999*
*Calls will be recorded and may be monitored

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