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The Modification Panel Secretary
 Joint Office of Gas Transporters
 31 Homer Road
 Solihull
 West Midlands
 B91 3LT

12 October 2010

Dear Bob,

RE: UNC Modification Proposals: 0318 – 0323 & 0325 : Suite of Code Governance related Modification Proposals.

Thank you for providing Scotland Gas Networks & Southern Gas Networks with the opportunity to comment on the suite of Code Governance related UNC Modification Proposals 0318/0318A - 0323 & 0325 inclusive. SGN have provided a single response below detailing SGN's view on the implementation of each of the Modification Proposals 0318/0318A - 0323 & 0325 and a view of which of the relevant objective (s) each proposal better facilitates in the table below.

SGN supports all eight UNC Modifications which seek to implement the necessary UNC changes to facilitate Large Transporter Licence obligations to align UNC obligations with that of the Code Administrators Code of Practice document, with a marginal preference for UNC Modification 0318A over Modification Proposal 0318.

UNC Modification	SGN Recommendation on Modification Proposal Implementation	Better Facilitates Relevant Objective
0318	Support	Standard Special Condition A11.1 (c) & (f)
0318A	Support (Preferred)	Standard Special Condition A11.1 (c) & (f)
0319	Support	Standard Special Condition A11.1 (c)
0320	Support	Standard Special Condition A11.1 (c)
0321	Support	Standard Special Condition A11.1 (c) & (f)
0322	Support	Standard Special Condition A11.1 (c), (d) & (f)
0323	Support	Standard Special Condition A11.1 (c)
0325	Support	Standard Special Condition A11.1 (c) & (d)



UNC Modification 0318 / 0318A – The Approach to be taken when raising Alternative Modification Proposals:

SGN is supportive of both UNC Modification Proposals 0318 & 0318A and agrees with the proposers regarding the specific relevant objectives which would be better facilitated as a result of their implementation. SGN has a slight preference for the implementation of UNC Modification Proposal 0318A as it provides for the further introduction of guidance to the UNC Modification Panel in relation to the development of alternative Proposals.

UNC Modification 0319 – Role of Code Administrators and Code Administration Code of Practice:

SGN supports the implementation of UNC Modification 0319; the Modification Proposal will facilitate the role of the Joint Office of Gas Transporters in its position as a 'critical friend' specifically in relation to the assistance offered to small participants and consumer groups in the increased involvement in the development of the UNC. The role of the code administrator in relation to the Code of Practice will also be facilitated through the implementation of this Proposal. SGN agrees with the Proposer of this Modification Proposal that relevant objective Standard Special Condition A11.1 (c).

UNC Modification 0320 – Appointment and Voting Rights for a Consumer Representative and Independent Chair:

SGN is supportive of UNC Modification Proposal 0320 and agrees with the proposer regarding the specific relevant objective which would be better facilitated as a result of its implementation.

UNC Modification 0321 – Approach to Environmental Assessments within the UNC:

SGN is supportive of UNC Modification Proposal 0321 which will introduce the requirement for the proposer of a UNC Modification Proposal to include, where appropriate, a quantifiable assessment of the impact on greenhouse gas emissions. SGN also agrees with the proposer of the Proposal regarding the better facilitation of the relevant objectives, Standard Special Condition A11.1 (c) & (f).

UNC Modification 0322 – Inclusion of the NTS Transportation and Connection Charging Methodologies within the UNC:

SGN is supportive of UNC Modification Proposal 0322 and agrees with the proposer regarding the specific relevant objectives which would be better facilitated as a result of its implementation.

UNC Modification 0323 – Self Governance:

SGN welcome the introduction of a self governance route for Modification Proposals into the UNC Modification Rules which will increase the efficiency to which non material changes to the code can be implemented. SGN is supportive of UNC Modification Proposal 0323 and further agrees with the proposer regarding the specific relevant objectives which would be better facilitated as a result of its implementation.



UNC Modification 0325 – DN Transportation Charging Methodology:

SGN is supportive of UNC Modification Proposal 0325 and agrees with the proposer regarding the specific relevant objective which would be better facilitated as a result of its implementation.

We hope you find these comments helpful.

Yours faithfully

Joel Martin