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Tim Davis
UNC Modification Panel Secretary
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
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E:mail: Jeff.Chandler@SSE.com

Our Reference:
Your Reference:

[Date 11 October 2010](#)

Dear Tim,

Modification Proposal of 0318 & 0318 A

Thank you for providing SSE, with the opportunity to comment on the above Modification Proposal.

SSE is supportive of proposal 0318 and 0318A, but thinks that 0318A better facilitates meeting the relevant objectives.

EON UK, propose that section 6.4.1 (c) of existing Modification Rules should be removed and a new section added stating the following:

- Alternative Proposals shall be allowed to be raised up until the time a Workstream or Development Workgroup Report is submitted to the Panel. Where the Panel subsequently send the Report back to the relevant group, then at that point alternatives may once more be raised up until the time a revised report is submitted to the Panel.
- Once a modification proposal(s) proceeds to the Consultation Phase, with or without an alternative, no further alternative can be raised.

It is further proposed that, in considering whether any Modification Proposal should be issued directly to consultation, the Modification Panel shall have regard to the following guidance:

- (a) whether the Proposal is sufficiently clear that all interested parties may be expected to readily understand its content and appreciate the implications
- (b) the complexity and likely impact of the proposal on code signatories and other materially affected parties; and
- (c) whether there is a reasonable prospect that viable alternatives will be brought forward.



SSE agrees with the Proposer that implementation of the proposed Modification would better facilitate the relevant objectives as detailed in the Modification Proposal.

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

Yours sincerely

Jeff Chandler
Head of Fuel Strategy
Energy Strategy



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Dear Tim,

Modification Proposal 0319

Thank you for providing SSE with the opportunity to comment on the above Modification Proposal.

SSE is supportive of proposal 0319.

This Proposal aims to implement changes to the UNC to enable the Joint Office to be able to comply with the following requirements:

The CGR Final Proposals require that code administrators:

- Act as a 'critical friend', in particular to small participants; and
- Act consistently in line with the Code Administrator Code of Practice.

SSE agrees with the Proposer that implementation of the proposed Modification would better facilitate the relevant objectives as detailed in the Modification Proposal.

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

Yours sincerely

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Head of Fuel Strategy
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Dear Tim,

Modification Proposal 0320

Thank you for providing SSE, with the opportunity to comment on the above Modification Proposal.

SSE is not supportive of proposal 0320.

SSE does not support the following concepts:

1. 2 (two) Consumer Representatives will be able to be appointed to the panel, one nominated by the National Consumer Council, and the second nominated by the Authority.
2. Both Consumer Representatives will be full voting members on the panel.
3. Consumer Representatives will also vote on self governance proposals.

SSE believe that in the interests of maintaining an appropriate balance of interests on the panel this must be limited to one consumer representative with one voting right.

Customer representatives should not purport to represent only one interested party (e.g. domestic consumers in the case of Consumer Focus). The constitution should reflect the diversity of the gas market including both Generators and I&C customers. consumer representative.

We do not agree that any consumer representative should be appointed by Ofgem. A transparent process for seeking, selecting and appointing consumer representatives should be established. This will help ensure that a broad range of consumer representation can be achieved, without raising concerns about the extent of independence of that representative.



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

Yours sincerely,

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Head of Fuel Strategy
Energy Strategy



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Dear Tim,

Modification Proposal 0321

Thank you for providing SSE, with the opportunity to comment on the above Modification Proposal.

SSE is supportive of Proposal 0321.

This proposal will ensure that, in respect of the relevant objectives, future Modification Proposals shall include an assessment, where material, of the quantifiable impact of greenhouse gas emissions.

SSE agrees with the Proposer that implementation of the proposed Modification would better facilitate the relevant objectives as detailed in the Modification Proposal.

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

Yours sincerely

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Dear Tim,

Modification Proposal 0322

Thank you for providing SSE with the opportunity to comment on the above Modification Proposal.

SSE is supportive of proposal 0322.

SSE welcomes the opportunity for Users to have the ability to raise direct change proposals to the NTS Charging Methodology.

SSE agrees with the Proposer that implementation of the proposed Modification would better facilitate the relevant objectives as detailed in the Modification Proposal.

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

Yours sincerely

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Dear Tim,

Modification Proposal 0323

Thank you for providing SSE with the opportunity to comment on the above Modification Proposal.

SSE is supportive of proposal 0323.

The purpose of including Self Governance within the CGR was to ensure that industry resources will be focused on more material matters and that the implementation of non-material proposals will be facilitated faster. In addition Self Governance can reduce administrative time and effort reducing both the time and cost expended on non-material proposals.

SSE agrees with the Proposer that implementation of the proposed Modification would better facilitate the relevant objectives as detailed in the Modification Proposal.

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

Yours sincerely

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Dear Tim,

Modification Proposal 0324

Thank you for providing SSE with the opportunity to comment on the above Modification Proposal.

SSE is supportive of proposal 0324.

SSE agrees with the Proposer that implementation of the proposed Modification would better facilitate the relevant objectives as detailed in the Modification Proposal.

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Yours sincerely

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Dear Tim,

Modification Proposal 0325

Thank you for providing SSE with the opportunity to comment on the above Modification Proposal.

SSE is supportive of proposal 0325.

SSE welcomes the opportunity for Users to have the ability to raise direct change proposals to the DN Charging Methodologies.

SSE agrees with the Proposer that implementation of the proposed Modification would better facilitate the relevant objectives as detailed in the Modification Proposal.

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

Yours sincerely

Jeff Chandler
Head of Fuel Strategy
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