



Scotia Gas Networks,  
St Lawrence House,  
Station Approach,  
Horley,  
RH6 9HJ

Modification Panel Secretary  
Joint Office of Gas Transporters,  
First floor South,  
31 Homer Road,  
Solihull,  
West Midlands,  
B91 3LT

19 May 2011

Dear Bob,

**Re: Modification Proposal 0362: Use of 'notional Meter Readings' and 'Agreed Opening Meter Readings' for Individual CSEP Reconciliation**

Thank you for providing Scotia Gas Networks with the opportunity to comment on the above Modification Proposal. SGN **supports** implementation of Modification Proposal 0362 and agrees that it meets the self governance criteria and should therefore follow this route for implementation.

This Proposal seeks to amend the generic LDZ CSEP NExA Annex A to extend the Meter Reading types which can be utilised to reconcile Transportation Commodity charges and Energy Charges at CSEP Larger Supply Points. Existing generic LDZ CSEP NExA terms restrict such to 'Valid Meter Readings' which do not extend to the two reading types specified in the title of this Proposal.

**Extent to which implementation of the proposed modification would better facilitate the relevant objectives:**

SGN is in agreement with the Proposer that this Modification will help fulfil the relevant objectives:

**Standard Special Condition A11.1 (d): Securing of effective competition.**

Implementation of this Modification Proposal will provide the opportunity for a greater quantity of data to be collected and reduces the risk to Users where charges are levied against the RbD mechanism. This will lead to more accurate allocation of costs.

SGN is also satisfied that the legal text provided fulfils the intent of the modification proposal.



We hope you find these comments helpful.

Yours sincerely

Colin W. Thomson  
LTS Commercial Manager  
Scotia Gas Networks

T: 0131 469 1809  
M: 07768 467514  
e: colin.thomson@sgn.co.uk