

## Representation

### Draft Modification Report

#### 0373: Governance of NTS connection processes

**Consultation close out date:** 30 March 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** SSE  
**Representative:** Jeff Chandler  
**Date of Representation:** 29 March 2012

#### Do you support or oppose implementation?

Support \* *delete as appropriate*

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

The current connection process is opaque, SSE has found the process frustrating and it has not facilitated investment in the UK. This mod proposal should result in an equitable and transparent connection process with clear governance and deliverables.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

SSE agree with the detailed comments in the draft modification report.

#### Impacts and Costs:

*What analysis, development and ongoing costs would you face if this modification were implemented?*

SSE do not envisage any material costs to be incurred by adjusting to the new physical NTS connection process. Infact, now that a transparent process is proposed with defined time scales & costs we would expect project execution times to be reduced.

#### Implementation:

*What lead-time would you wish to see prior to this modification being implemented, and why?*

0373

Representation

29 March 2012

Version 1.0

Page 1 of 2

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As soon as possible. The uncertainty created by the current regime is a barrier to entry, is opaque and delays investment in the UK.

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

Yes

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

The lack of governance around the connections process has been a substantial source of delay and frustration. By comparison, the capacity application process is clearly specified in the UNC and does not suffer from the same degree of opaqueness. As a result SSE would urge that this mod is implemented quickly and future plans to align capacity and connections do not delay this mod in any way.