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Horley,
RH6 9HJ

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

01 December 2010

Dear Tim,

Re: Modification Proposal 0342, Amendment to the DN Adjustment Window

Thank you for providing Scotia Gas Networks with the opportunity to comment on the above Modification Proposal. SGN supports implementation of Modification Proposal 0342.

This Modification Proposal has been raised by National Grid NTS and proposes that the indicative Offtake Capacity Statement and/or indicative Offtake Pressure Statement, for both the transitional and enduring periods, be provided by no later than 15 Business Days after the closure of the Annual Application Window in July.

The Modification further proposes that the number of Business days available to a DNO User, on receipt of the Indicative OCS or OPS, to clarify, reconsider and resubmit its application(s) for NTS Exit (Flexibility) Capacity and/or Assured Offtake Pressures and, NTS Offtake (Flat) Capacity is increased from 5 (Five) to 10 (Ten) Business Days. This also extends to the submission of revised applications where National Grid NTS wholly or in part rejects a request for additional NTS Exit (Flexibility) Capacity or an increase in Assured Offtake Pressure.

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

Standard Special Condition A11.1 (a): the efficient and economic operation of the pipe-line system to which this licence relates:

SGN consider that the implementation of this Modification Proposal would be a pragmatic approach in allowing both National Grid NTS and DNO's the additional time to undertake more detailed analysis and to engage in further discussions on the options available, thereby ensuring that the system is utilised in the most economic and efficient manner.



Standard Special Condition A11.1 (b): so far as is consistent with subparagraph (a), the coordinated, efficient and economic operation:

By extending the timescales available to the DNO's to respond to National Grid NTS, will allow time to evaluate whether the initial allocations are sufficient to meet the DNO's obligations under its Licence. It will also allow National Grid NTS additional time to ensure that constrained areas of the network have been assessed and evaluated, mitigating the need for potential investment.

We hope you find these comments helpful.

Yours sincerely

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