



Scotland Gas Networks
Axis House
5 Lonehead Drive
Edinburgh
EH28 8TG

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

12 January 2011

Dear Bob,

Re: Modification Proposal 0292 : Proposed change to the AQ Review Amendment Tolerance for SSP Sites.

Thank you for providing Scotland Gas Networks & Southern Gas Networks with the opportunity to comment on the above Modification Proposal. SGN would wish to offer comments only at this stage on the Modification Proposal.

This Modification Proposal has been raised by Scottish Power and proposes to reduce the AQ amendment threshold from 20% to 5% of the value of the amendment. The current threshold was originally instigated to maintain the number of AQ amendments at a manageable level and also to support the concept of the systematised AQ review process. The reduction in this amendment threshold will result in a substantial number of AQ amendment submissions to which the Modification Proposal provides specific rules around submission caps which are further supported by an associated guidance document detailing the process by which xoserve will allocate any additional system capacity and also detailing the daily AQ amendment submission caps per User.

Although SGN would support a process which would result in the calculation of more reflective (of actual consumption) Supply Point AQs we recognise that procedures already exist within the UNC which permit the provision of Supply Point meter readings which permit & may result in the calculation of AQs in this manner. We would further highlight that were all Users to participate in the submission of AQ amendments in the manner required in terms of submitting both increases and decreases to the Provisional Annual Quantity there is likely to be a minimal impact to the overall User's portfolio quantity.

We hope you find these comments helpful.

Yours sincerely



Joel Martin

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