



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

10 January 2011

Dear Bob,

Re: Modification Proposal 0344, Removal of the D+1 11am meter read liabilities regime for DM voluntary (DMV) Supply Points

Thank you for providing Scotia Gas Networks with the opportunity to comment on the above Modification Proposal. SGN supports implementation of Modification Proposal 0344.

This Modification Proposal has been raised by Wales & West Utilities Ltd. and proposes to exclude Daily Metered voluntary (DMV) Supply Points from the definition of Performance Relevant Supply Meters for the purposes of the day after the day 11am read provision to Users (UNC TPD Section M 5.2.2).

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 (a): the efficient and economic operation of the pipe-line system to which this licence relates:

The removal of DMV Supply Points from the day after the day 11am liability regime will further incentivise DN Operators to attend any faults at mandatory DM sites rather than at present providing an equal incentive to attend faults and DMV sites. Since mandatory DM sites can play a material part in the efficient operation of the pipe-line system, a regime that further incentivises attendance at faults at mandatory DM Supply Points will facilitate the achievement of this relevant objective

Standard Special Condition A11.1 (f): promotion of efficiency in the implementation and administration of the Code:

Implementation of this Modification Proposal will also be good for efficient administration



and implementation of the UNC by having a service which is regulated and incentivised by competitive pressures rather than liabilities.

We hope you find these comments helpful.

Yours sincerely

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