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Julian Majdanski
UNC Modification Panel Secretary
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
Solihull
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Dear Julian

Modification Proposal 0147

Thank you for providing Scottish and Southern Energy plc (SSE) with the opportunity to comment on the above Modification Proposal.

SSE is generally supportive of the underlying principles behind the above Mod; following Ofgem Best Practice Guidelines – lowering the amount of security that needs to be provided and reducing barriers to entry.

SSE has the following comments on the above Proposal:

- It appears that this mod has the Moody's and S&P ratings muddled up. A and BB- are S&P not Moody's as written. The terminology needs to be clear and consistent - we believe they are referring to the full A banding (which SSE agree with) but clarification is required as there is a significant difference across the range of A bands.
- An unsecured credit limit is proposed for Ba3 and below. We are surprised at this because this is below an investment grade rating.
- It is unclear how the cure and remedy process will function in practice and clarity is requested as to how a user will get back from 50 to 100%?

Yours sincerely

Jeff Chandler
Gas Strategy Manager
Energy Strategy