

Julian Majdanski Modification Panel Secretary Network Code Development 31 Homer Road Solihull West Midlands B91 3LT

21st November 2005

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Dear Julian,

The following is the Scottish Power response to:

<u>UNC Modification Proposal 0060 "Publication of Information in the Maintenance Programme"</u>

Support

Thank you for allowing us to respond to this modification. Scottish Power supports this modification proposal.

There have been a number of changes over the last few years impacting the number of directly connected supply points and the competitive nature of the market in which they operate. This modification seeks to make one positive change to the procedures surrounding planned maintenance contained in Section L of the Uniform Network Code which we believe will be of benefit to the user and the transporter.

Problems for Affected Parties

We believe that to date the information in the maintenance programme has been published only in a very general way, inasmuch as most direct connects on the NTS have been identified as potentially affected points. The information as per the code has been available but this has been withheld in practice for reasons of commercial confidentiality. This has been known to cause problems for maintenance affected parties in the past.

Furthering the Relevant Objectives

Implementing this modification will further the relevant objectives by improving the efficiency of the maintenance of the system. Furthermore the commercial confidentiality of such affected parties will be preserved, promoting competition. Should this proposal

not be implemented we would expect to see further problems in the co-ordination of plant outages and maintenance in future, and a hindrance of competition.

Legal Text

As proposer of this modification, we acknowledge that the legal text could be clearer on the substance and target of the information – hence we support the amendments put forward by National Grid in their response. Should this proposal not be implemented we would expect to see further problems in the co-ordination of plant outages and maintenance in future, and a hindrance of competition.

Contact

Should you have any queries on the views expressed please contact me on the telephone number as shown.

Yours sincerely,

Commercial & Regulation Manager (Gas)