ScottishPower

energy management

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

15th December 2005

0141 568 2464

0141 568 4464

Dear Julian,

The following is the Scottish Power response to:

UNC Modification Proposal 0066 "Programmed Maintenance Notice Periods at NTS System Exit Points"

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 further positive changes 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.

We also appreciate the role of National Grid in proposing some of the changes which are being codified in this modification and have agreed in dialogue with them some further points of clarity which should facilitate the production of the associated legal text.

Problems for Affected Parties

Information to date regarding the programme of on-line inspection work (which can cause considerable disruption to maintenance affected parties) has not previously been generally available. Also indications of maintenance outages other than the required 30 day notice period have not been forthcoming. 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. 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 believe that any text provided for this modification should incorporate the elements suggested by National Grid in its response, which have been discussed with us.

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) ScottishPower Energy Management