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Julian Majdanski UNC Modification Panel Secretary Joint Office of Gas Transporters Ground Floor Red 51 Homer Road Solihull B91 3OJ

Dear Julian

## $\begin{tabular}{ll} Urgent Modification Proposal 0067: Compensation Payments to Users whose gas flows are curtailed following instruction from the NEC \\ \end{tabular}$

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

## **The Modification Proposal**

CSL has proposed that storage users who have had their flows from storage curtailed would be able to apply for compensation under new rules which would be similar to those that currently exist under TPD Section Q.4.2.5.

As we have stated in responses to previous consultations, we have concerns that parties' rights to gas in store could be curtailed without compensation when the market is still in operation. We therefore believe that this proposal would help to remove the perverse incentives that the current arrangements may place on market participants to prematurely withdraw their gas from store for fear that it might be stranded later on in the winter. In addition, the ability to claim for compensation should encourage storage users to reinject gas into store over the winter period, resulting in a more efficient and economic use of the storage facilities.

In summary, SSE confirms its support for implementation of the proposal.

Yours sincerely

Katherine Marshall Energy Strategy