Grampian House 200 Dunkeld Road Perth PH1 3GH

Direct Tel: 01738 457909 Direct Fax: 01738 456194

Email: Jeff.chandler@scottish-southern.co.uk

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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

Modification Proposal 0076

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

SSE is supportive of the proposal.

SSE believes the proposal is consistent with Ofgem conclusions document - Best Practice Guidelines for Gas and Electricity Network Operator Credit Cover. In the document Ofgem suggested two improvements:

- 1. improved efficiency in relation to payment terms
- 2. Network Operators should have the right of set off under codes.

We understand the right of set off would be applied where the Transporter and User have agreed this in writing. The exception is where the User is in breach of payment terms. In such cases the Transporter would not require the User's agreement. However the Transporter would be required to issue a set off notice. We believe this should provide the User with adequate notice.

SSE believes the proposal will further the relevant objectives improving efficiency in terms of implementation of the code and improving operational efficiency through reducing amounts outstanding, the number of invoices to be issued and banking charges.

Yours sincerely

Jeff Chandler Energy Strategy