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

Dear Julian

Modification Proposal 0077

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 that document Ofgem set out a number of requirements which Transporters are required to comply with.

Although, this proposal represents a significant tightening compared to existing UNC arrangements we believe they are consistent with Ofgem's best practice guidelines.

In relation to relevant objectives, we believe the proposal will help secure effective competition, providing clarity and ensuring no undue discrimination for participants. Whilst it might increase costs for some Users, we believe this has to be balanced against the added protection for Transporters and the Shipping community at large.

Yours sincerely

Jeff Chandler Energy Strategy