Scottish & Southern Energy Grampian House 200 Dunkeld Road Perth PH1 3GH Direct Tel: 01738 457909 Direct Fax: 01738 456194 Email: Jeff.chandler@scottish-southern.co.uk 30 December 2006

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

Dear Julian

Modification Proposal 0125

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

SSE is not supportive of this proposal.

NG NTS has stated that the costs of provision of collateral for the Residual Balancer role, based on historic use and dependent on gas costs and the extent of the Residual Balancer role, are currently estimated to be in the range of £30,000 to £50,000 per annum. SSE would like further information provided so that it can understand how this cost is derived.

SSE are unable to support this mod as we feel that the Draft Modification Report is insufficiently clear and more information is required for clarity and transparency.

NG NTS detailed that the charge would be passed through as part of the Neutrality smear and not as a separate line on the invoice. Shippers would therefore not have transparency on the portion of the charge relating to the residual balancers costs or have anyway in which to validate the charge.

Yours sincerely

Jeff Chandler Energy Strategy