

Orpington Kent BR5 2TN

Modification Panel Secretary Joint Office of Gas Transporters First Floor South 31 Homer Road Solihull West Midlands B91 3LT

12 October 2007

Dear Julian,

Modification Proposal: 0174: Revised Tender Timescales for DN Interruption Arrangements.

Thank you for providing Scotia Gas Networks with the opportunity to comment on the above Modification Proposal.

SGN supports implementation of Modification Proposal 0174.

The current revised interruption arrangements to be implemented on 1 April 2008 specify that the annual tender for interruption rights shall take place in June each year with Interruption requirements being published not less than 28 days earlier and results being published not later than 28 days after the tender. SGN believe these timescales allow little time for analysis and application for NTS exit capacity which under the present arrangements has to be completed before the end of July.

This proposal seeks to alter the timing of the annual tender for interruptible rights for the results to be published at the end of July each year. SGN believe this would allow sufficient time within the timescales for the application of NTS Exit Capacity.

Implementation of this Proposal would better enable DNs to determine the interruption and capacity requirements that they need to meet their 1 in 20 obligation as this would allow additional time for analysis to be carried out. This would allow the DNs to make informed decisions about investment in their networks and hence could better facilitate the efficient and economic operation of the DNs.

We hope you find these comments helpful.

Yours sincerely

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