

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

Telephone: 01738 440224

E:mail: Jeff.Chandler@  
scottish-southern.co.uk

Our Reference:

Your Reference:

Date : 9 November 2007

Dear Julian,

### **Modification Proposal 0181**

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

SSE does not support modification 0181.

The full period of the Gemini failure is not covered by this mod proposal. Gemini was only partially restored on the 26th, it was not until after the 28th that service became more reliable than intermittent and provided a more stable environment. SSE believes that the period affected should be extended and consequently the dates should therefore be 22<sup>nd</sup> to at least the 28<sup>th</sup> October.

SSE believes a zero charge should be applied during the affected period. It is unfair to penalise Shippers for NGG's failure to have adequate contingencies in place upon failure of Gemini. The shipping community is not obliged to pay transportation charges when they are erroneous. SSE believes these charges to be incorrect and therefore should not be imposed.

A full investigation as to the robustness and appropriateness of the contingency arrangements is necessary to identify actions to prevent a similar event occurring in the future. SSE would question whether a fax contingency is still the best way to communicate and if e-mail of electronic files would be more effective. Does the criticality of the Gemini system warrant a systems back-up?

However, if this mod were implemented SSE would not be supportive of it setting a precedent as a solution for future Gemini failure incidents.

Yours sincerely

Jeff Chandler  
Gas Strategy Manager  
Energy Strategy