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Modification Panel Secretary Joint Office of Gas Transporters Ground Floor Red 51 Homer Road Solihull West Midlands B91 3QJ

13 March 2008

Dear Julian,

Modification Proposal 0200 Introduction of a Date Tolerance to Facilitate the Processing of Individual Meter Point Reconciliation at LDZ CSEPs

Thank you for the opportunity to comment on this Modification Proposal. Scotia Gas Networks fully support implementation of this Modification Proposal.

To achieve reconciliation of applicable Transportation and Energy charges related to Larger Supply Points at CSEPs sites, the iGTs are required to submit reconciliation volumes to the DNO within 30 days of receiving a reading from the relevant meter/s. This volume is compared to the deemed volume recorded against the relevant LMN to derive a reconciliation value.

There are occasions where the reconciliation volumes submitted by the iGT are rejected, this is due to the mismatch between DNO and iGT records of applicable start and end dates for the LMN. The DNO is unable to process the reconciliation volume when this occurs. Generally the current level of reconciliation performance is poor. It is believed that the mismatch between start/end dates and associated rejections is a significant contributing factor.

This proposal aims to introduce a date tolerance of 9 Business Days in relation to start/end dates for the relevant LMN. This date window will be applied by DNOs and does not require the iGT to change any operational processes. It is proposed that Annex A of the LDZ CSEP NExA be amended to formalise this change.

This Modification Proposal is a result of numerous discussions with iGTs and seems a pragmatic solution to try and improve the level of I&C reconciliations processed. SGN agrees with the Proposer that it would better facilitate the relevant objectives, primarily facilitating competition, by

helping to ensure that energy is allocated to the correct market sector, and transportation and energy charges are apportioned accordingly.

We hope you find these comments helpful

Yours sincerely

Bali Dohel Network Officer