

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

Telephone: 01738 457909

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

Date : 6 Oct 2008

Dear John,

Modification Proposal 0222 – Amendment of I/C UK’s Minimum Wobbe Limit

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

SSE is supportive of proposal 0222.

SSE believes that reduction of the minimum allowed Wobbe Index within the IUK’s Network Entry Provisions and Network Exit Provisions to the current GSMR minimum of 47.2 MJ/m³ would remove potential barriers to increased gas flows into the UK from the continent and increase security of supply.

However, there may be impacts on the following aspects of system operation that SSE would like to understand more fully:

- What are implications for capacity (entry and exit, particularly flex) in the South East if Bacton flows at a higher rate.
- NGG state there should be no adverse impact on CV shrinkage yet this has been identified as a significant issue under the SO Incentive consultations. Last year NGG suggested we need to look at capping arrangements because of Wobbe limits of new gas flows.

SSE believes that the proposal will better facilitate the relevant objectives of Standard Special condition A11.1 (e). Lowering the Wobbe Index will bring the interconnector into line with other ASEP’s and Exit points and will enhance competition by allowing gas to be imported and exported to/from the UK with greater ease.

Please do not hesitate to give me a call if you wish to discuss this further.

Yours sincerely

Jeff Chandler
Gas Strategy Manager
Energy Strategy