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Modification Panel Secretary  
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Dear John

**Modification Proposal: 0239 Reinstatement of NTS Interruption.**

Thank you for providing Scotia Gas Networks with the opportunity to respond to Modification Proposal 0239. SGN is supportive of this Modification proposal.

SGN believes implementation of this proposal will allow National Grid NTS to access existing NTS Interruptible Exit capacity beyond October 2011 by amending the provisions of the Transitional Document. SGN agree that it is expected to maintain the existing level of contractual risk by preserving NTS Interruption as an efficient commercial tool for National Grid to manage capacity constraints.

SGN consider implementation of this proposal would facilitate the achievement of the following Relevant Objectives:

**Special Standard Condition A11.1 (a) the efficient and economic operation of the pipeline system:**  
SGN believe implementation of this proposal would allow NG NTS to continue to use NTS Interruption where it is more economical to do so rather than provide additional transportation capacity, use Operating Margins gas or undertake entry capacity buy-backs to meet a within-day system constraint.

**Special Standard Condition A11.1 (c) the efficient discharge of the licensee's obligations under this licence.**

Reinstating access to NTS Interruption would remove the need to construct additional transportation capacity within tight timescales to supply the forecast Peak Day Demand for 2011. Therefore SGN believe implementation of this Modification Proposal would better facilitate this objective by permitting National Grid NTS to meet its licence obligation.

We hope you find these comments helpful.



Yours sincerely

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