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Modification Panel Secretary
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Dear John

Modification Proposal: 0259 - Removal of Obligations to Install UK Link User Equipment and UK Link User Software for UK Link Users who Utilise the Services of an UK Link User Agent.

Thank you for providing Scotia Gas Networks (SGN) with the opportunity to respond to Modification Proposal 0259. SGN supports the implementation of this Modification Proposal.

Currently the UNC requires a new User applicant to the Uniform Network Code to have installed specific UK Link equipment and software at their premises prior to admission. A number of new applicants to the code procure the services of a UK Link User Agent to carry out required UK Link communications under contract and hence do not utilise the equipment they have had installed. This unused equipment currently attracts an installation charge for the User as detailed in the Agency Charging Statement (Service Line 6) and also requires the Transporter to fund the actual equipment and on going maintenance charges. The implementation of UNC Modification 0259 would have the affect of removing this obligation only where the new User has contracted for UK Link services with a User Agent as detailed in UNC TPD Section V 6.3.1 and hence reducing cost for both Users and Transporters. The removal of the obligation as specified in V2.1.2 (d) for Users utilising a UK Link Agent would also improve the efficiency of the Shipper admission process where equipment is not required by shortening the length time taken to accede to the UNC.

The Modification also clarifies the contingency arrangements where a User may continue to perform UK Link communications using the XP1 token process in scenarios where their User Agent is unable to provide a service on their behalf. SGN are satisfied that such arrangements provide for an adequate contingency level in the unlikely event that this should occur.

Modification Proposal 0259 further clarifies the position in relation to UK Link installations outside of the United Kingdom. Section V 2.1.2 (d) (i) currently obliges a new User to install UK Link equipment and software at their premises. During the development of MOD 259 xoserve have further clarified that it is not possible to install UK Link equipment outside of the United Kingdom.



In relation to the definition of Modification 0259 as not 'User Pays' reflects the fact that there would be no incremental agency costs associated with the implementation of the Modification Proposal which is in line with the current version of the User Pays Guidance document.

We hope you find these comments helpful.

Yours sincerely

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