

John Bradley Modification Panel Secretary Network Code Development 51 Homer Road Solihull West Midlands B91 3LT

10 May 2010

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Dear John,

The following is the Scottish Power response to

UNC Modification Proposal 0284 - Removal of the Zero Auction Reserve Price for Withinday Daily NTS Entry Capacity (WDDSEC)

We support this modification.

We believe that this increases cost reflectivity and has a benefit to competition in preventing cross subsidies.

We believe that when a zero price is available, a trader will take this, but it does not mean no value is attached to the capacity. In our view the price paid should be related to the auction price/cost of providing the capacity, which should also more closely relate to the value attached to the capacity.

We are also keen to see a measure which addresses the large TO entry commodity costs which amount to a smear for many users.

Should you have any queries on the views expressed, please contact me on the telephone number as shown.

Yours Sincerely,

Commercial & Regulation Manager (Gas) Scottish Power Energy Wholesale

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