

Eastern Business Park Wern Fawr Lane St. Mellons CF3 5EA

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

> Email: mark.jones@ scottish-southern.co.uk

Date : 12 Jan 10

Dear John,

Modification Proposal 0268

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

SSE is supportive of Modification Proposal 0268.

The output from the 2010 Seasonal Normal Review will mean that revised WAALP values for the period post 1 October 2006 only will be available. It is incorrect to apply outdated WAALPs to AQ values going forward, and so it is proper to change the current fixed AQ backstop date to one that rolls forwards with each SN Review. SSE also agrees with the date methodology to be applied.

The number of non calculated AQ values will be small as a result of this modification and the multiplicative factor proposed for those not calculated is carrying on the process that was implemented during the last SN review.

The implication of not implementing this Modification Proposal is that a small number of AQ values would be partially set on outdated WAALP values, which would not be consistent with ensuring that energy allocation is as accurate as possible.

All in all SSE sees this is as a very sensible and necessary Modification Proposal to allow for the periodic recalculation of the WAALP values and the effect this has on AQ calculations.

SSE agrees with the proposer that implementation of the proposed modification would better facilitate the relevant objectives as detailed in the Modification Proposal.

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

Yours sincerely,

Mark Jones