

SSE have the following issues with mod 116 that we would appreciate further clarification on:

Prevailing rights are to be allocated to users at an offtake point. For storage sites the users change each year and this may result in an inappropriate allocation of capacity.

It might be that an aggregate allocation to a storage operator is more suitable, even when that storage operator is not a shipper.

Bi-directional sites such as storage sites can create negative flex on the system, how will this be accredited?

It is proposed that pressure guarantees are given to DNOs but not for NTS direct connects. Is this discriminatory?

Regards

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