

Grampian House 200 Dunkeld Road Perth PH1 3GH

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

> E:mail: Jeff.Chandler@ SSE.com

Date 3 February 2011

Dear Tim,

Modification Proposal 0341- Manifest Errors in Entry Capacity Overruns

Thank you for providing SSE with the opportunity to comment on the above Modification Proposal.

SSE is not supportive of Proposal 0341.

SSE does not believe that any UNC Modification should apply retrospectively as this may set a precedent of regulatory and market uncertainty.

However, valuable work has been undertaken to establish a manifest error provision for entry capacity overruns. If manifest error provision was to be developed on a nonretrospective basis then SSE would endorse such a mechanism.

Please do not hesitate to contact me if you wish to discuss this further.

Yours sincerely

Jeff Chandler Head of Fuel Strategy Strategy & Regulation