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Dear Richard,

**Review of NTS Entry Charge Setting Arrangements – Impact Assessment**

Thank you for providing SSE with the opportunity to comment on the above consultation. We support Ofgem's intention to veto the proposed introduction of GM19, UNC 284, and UNC 285. We have not provided answers to the specific consultation questions, but have reiterated our high level views below.

We believe that the introduction of GM19, UNC284 and/or UNC285 would have the following impacts:

- contradict the intention of the European Third Package by introducing a limit on the quantity of available short term capacity;
- increase regulatory uncertainty;
- reduce the viability of investment in UKCS exploration and production;
- reduce the attractiveness of the UK market for importing suppliers;
- reduce market liquidity by reducing the volume of short term capacity available to traders; and
- taking the above into account, would clearly detrimentally impact UK security of supply.

On the basis of the above, SSE support Ofgem's intention to veto the proposed introduction of GM19, UNC284 and/or UNC285.

Yours sincerely,

Claire Rathey  
Regulation Analyst