

Whilst we support the general principle of alignment of industry processes, SSE Energy Supply must REJECT this Modification proposal, as written, for the following reasons:

Since the iGTs are not party to the UNC, this process will need to be fully announced into their Unified Network Code. This Mod therefore, needs the process to be announced in full. As with past Modifications, there is an assumption that all participants understand the new processes to be used and the changes to be made. To aid understanding and clarify what is expected from this Mod, it needs to outline to participants an End to End process map setting out timescales, the specific data-flows to be created/utilised, and the business rules to be adopted. In this way they can fully analyse/impact asses and implement the changes.

This is to be entered into the legal text of the iGT UNC, therefore the iGTs should not be using references to processes held in other parties Codes, especially where they are not party to that Code and have no say in the changes to that process. This would be a retrograde step for new changes against the iGT UNC.

It is hard to see how this specific Mod will automatically improve the quality of AQ Values. First and foremost it seems important to put IT and Business time and effort into making sure that the I&C Reconciliation Process is implemented in full. Making sure that more Meter Reads are received from Shippers on a regular basis is paramount to the AQ Process working and performance in this area has been poor to date. Without regular reads for all SPs, implementing this new AQ Review Process will only have a limited success in transforming the AQ Values to be reflective of use.

The implementation date of May 2007 (the start of the process for Aqs that will be released in October 2007) will be less than 6 months from the earliest date OFGEM could direct to implement. This is too short for what is (potentially - once fully announced) a significant change to IT processes and new data-flows, which would need testing with 3rd parties (Xoserve?). Therefore the earliest this could be implemented would be late 2007, in time to be used for the 2008/09 AQ Review.

Regards,
Cher

Cher Harris
SSE Business Architecture and National Design Group