

David Edward
Head of Electricity Code Development
Office of Gas and Electricity Markets
9 Millbank
LONDON SW1P 3GE

AMK/8.11

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Dear David

**MODIFICATION TO NGC'S TRANSMISSION LICENCE:
BSC MODIFICATION PROPOSAL IMPLEMENTATION DATES**

I am writing on behalf of ScottishPower in response to your April consultation paper setting out a proposed licence modification to improve the BSC modification process.

The view expressed by ScottishPower on this issue has been consistent through its responses to consultations on BSC Modification P28. It would be beneficial, particularly in respect of the Applicable BSC Objective which seeks to promote efficiency in the implementation and administration of the trading arrangements, for implementation dates for modifications to the BSC to be brought forward where this is deemed to be achievable. This would provide an element of flexibility to implementation which is currently lacking in the trading arrangements. It has also always been part of this view that market participants should be consulted on the feasibility of bringing forward implementation dates from their perspectives as part of the process for determining whether implementation dates should be brought forward.

Both of these elements are captured in the revised wording for Condition C 3.4(c) as suggested by Ofgem. On this basis, ScottishPower is supportive of the proposed modification to NGC's Transmission Licence.

If you wish to discuss any aspect of this response, please do not hesitate to contact me.

Yours sincerely

Alex MacKinnon
Regulation Manager