

Lesley Nugent
Head of Industry Codes and Licensing
Ofgem
9 Millbank
London
SW1P 3GE

27 August 2013

Dear Lesley,

Statutory consultation on further proposed changes following the implementation of the Third Package and other miscellaneous changes

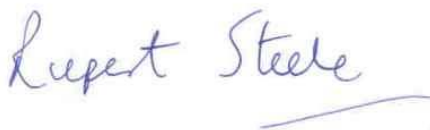
I am writing on behalf of ScottishPower's energy retail business in response to the above statutory consultation notice, with particular reference to the proposed modifications to Standard Condition 30 of the Gas Supply Licence.

We are broadly comfortable with the proposed changes to SLC 30 and the impact of having an obligation to comply with Regulation and any relevant legally binding decision of the European Commission and/or the Agency for the Cooperation of Energy Regulators.

We have identified some minor typographical errors and have provided our proposed corrections in Annex A.

We would be happy to discuss any of the above further if you require. Please contact Gareth Williams on 0141 568 3930 in the first instance if you wish to discuss or if you have any further questions.

Yours sincerely,



Rupert Steele
Director of Regulation

Annex A

Condition 30.9 (previously 30.8)

30.9 ~~(a)~~ The modification procedures referred to in sub-paragraph 30.7(a) must provide:

(a) for a modification report to be prepared in such manner and with all such contents as specified in the SPAA, which shall include an assessment of the extent to which the proposed modification would better facilitate achieving the relevant objectives and a detailed explanation of the reasons for that assessment;

(b) **that** where the proposed modification requires Authority approval in accordance with the provisions of the SPAA, for the revision and resubmission of the modification report upon, and in accordance with, a direction issued to the panel by the Authority where the Authority determines that it cannot properly form an opinion on the approval of the modification proposal;

(c) that proposals for the modification of the SPAA falling within the scope of a significant code review may not be made during the significant code review phase, except:

a. where the Authority determines that the modification proposal may be made, having taken into account (among other things) the urgency of the subject matter of the proposal; or

b. at the direction of the Authority;

(d) **that** where a modification proposal is made during a significant code review phase the panel shall:

i. unless exempted by the Authority, notify the Authority as soon as practicable of:

1. any representations received in relation to the relevance of the significant code review; and

2. the panel's assessment of whether the proposal falls within the scope of the significant code review and its reasons for that assessment; and

ii. if the Authority so directs, not proceed with the modification proposal until the significant code review phase has ended.