

Mr. Julian Majdanski
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
Solihull
West Midlands
B91 3QJ

20 September 2005

Dear Julian,

Modification Proposal 0024 - "Independent security provision by an entity with an Investment Grade Rating of 'A' or above"

Please note that this submission is also made on behalf of Total E&P (UK) plc.
Total Gas & Power Limited (TGP) & Total E&P (UK) plc support modification 0024.

Comments on the Draft Modification report are as follows:

- We agree that incorporating the security provision rules within the UNC increases the level of transparency of the credit provision process and so ensures that credit cover will be provided in a non-discriminatory fashion.
- The criteria suggested are proportionate and allows Users to source appropriate credit easily,
- A common set of rules, which apply to all Users will reduce the effects of industry fragmentation and ensure consistency across the network.
- We agree that an advantage of this modification is that it aligns with agreed best practice as, in this area, the recommendations detailed in Ofgem's consultation document have been fully consulted on and have wide industry support.
- We therefore believe that modification 0024 promotes the Transporters' ability to operate the network in an efficient and economic manner and so fulfills the relevant objectives of licence condition A11.

Should you wish to discuss our response further, please feel free to contact me.

Yours sincerely,

(This message is sent electronically and is therefore not signed)

Gareth Evans



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