

TOTAL GAS & POWER LIMITED

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

6th January 2006

Dear Julian,

Modification Proposal 0054 and 0054a – Emergency Curtailment Quantity Statement

Total Gas & Power Limited (TGP) support implementation of modification proposal 54a, however, we do not support implementation of modification proposal 54.

- We prefer the step-wise approach proposed in 54a since it is not clear within the present ECQ methodology statement whether the best available proxies will be utilised to derive ECQ volumes. This step-wise approach should also lead to more consistency, between transporters, when deriving these values for periods of emergency interruption. This consistency in turn should provide greater levels of clarity and reduce the ex-post administrative burden of shippers attempting to independently validate these transporter-calculated values. It may also reduce the number of appeals raised after the emergency period. Hence we consider proposal 54a, relative to 54, better facilitates the relevant objectives.
- TGP supports inclusion of the ECQ methodology within the UNC. In our view subjecting it to the same governance arrangements as the UNC will improve the transparency and accountability of the process. We note that mod 54 may only be subsequently modified if transporters, at their discretion, suggest proposed changes to the Network Code Committee. We see no reasonable justification for this approach, since the UNC governance arrangements including Ofgem should ensure that inappropriate methodology changes are not implemented.

Please feel free to contact me on the number below if you wish to discuss our response in more detail.

Yours sincerely,

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

Sharif Islam
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