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Dear Julian

Response to: BGT NETWORK CODE MODIFICATION PROPOSAL No. 0743 – "Amendment of nomination timetable"

Gaz de France ESS is in favour of proposed modification 0743.

The current closure window at D-1 between 13:00 and 17:30 does not allow users to submit the most accurate forecast of their DM demand at D-1. Information from customers may not be available and operational checks may not have been completed before this deadline. The proposal allows users to submit or resubmit DM nominations later in D-1 once NDM attributions are known. This should allow for a more accurate view of DM demand at D-1 and hence less variance to DM within day submissions. An added benefit of this proposal would be increased accuracy in NDM forecasts due to the calculation process.

Gaz de France ESS would support a sensible implementation date of this proposal and consider that this should coincide with the implementation of the Gemini system to ease potential operational difficulties.

We agree with the proposer(s) that the proposed modification would better facilitate GT Licence standard condition 9.1(a) to better encourage the efficient and economic use of the pipeline system and also 9.1(c) to ensure effective competition between relevant shippers and suppliers

If you have any queries regarding this response please contact me on 0113 3062104.

Yours sincerely

Phil Broom Regulatory Affairs Analyst