

TOTAL GAS & POWER LIMITED

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

10th November 2006

Dear Julian,

Modification Proposal 0123 - "Provision of Demand Information to Meet the 14:00 Total System Demand Forecast"

Total Gas & Power Limited does not support the above modification proposal.

As we have stated previously, we consider that Modification Proposal 0100 will not be consistent with current operational practices, particularly for interconnector parties. Substantial co-ordination is required at these points to ensure that individual nominations are validated between buyers and sellers to ensure that flow nominations may be accurately provided to the relevant transporters.

Many of these activities are presently conducted during the period in which the proposed OPN submission so it is by no means certain that implementation of the proposal would improve the quality of this information.

We do not believe that Modification 0123 will resolve these issues, and will create the further issue of inconsistency between information provided by system operators and directly connected sites. This will create discrepancies in the level of information at the disposal of the NTS. Shippers, who have given stronger indications of system requirement, may therefore be placed at a disadvantage in the event of system constraints. In order to avoid this issue, all Users need to be treated equally as was recognised by Modification 0100.

With regard to the timing of the raising of Modification 0123, we echo the concerns voiced by Ofgem over the process followed. It does not seem appropriate that for a Transporter to request a delay in implementation of a modification which they opposed, and subsequently for a Transporter to subsequently raise a change to nullify that modification. This exposes unnecessary costs to other Users of the system and undermines the credibility of the governance process currently in place.

Yours sincerely,

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

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