3 August 2007



Julian Majdanski
Modification Panel Secretary
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
Solihull
West Midlands    B91 3QJ

Dear Julian,

**Re: Draft Modification Report 0152V, 0152AV, 0152VB – Limitation on Retrospective Invoicing and invoicing correction**

Corona Energy ("Corona") wishes to submit the following in response to the above draft modification reports.

Corona supports the implementation of Modification 0152AV and does not support implementation of Modifications 0152V and 0152VB.

Corona is of the view that the industry should be afforded the longest time as is appropriate to backdate reconciliations, but recognise that a limitation on invoicing would be beneficial. The advantages of the limitation concept are covered in the draft reports, however it is clear to Corona that 0152AV best meets the Relevant Objectives. The imposition of a 6-7 year limitation as proposed in 0152AV is consistent with the Statute of Limitations Act and therefore should be considered to be the only viable option. It is our opinion that the requirements contained with the UNC should in line with other provisions in English Law.

Corona concurs with the statements provided in the draft report concerning the fulfillment of the Relevant Objectives, however, it would add that that an additional consideration of 0152AV is that it will better facilitate competition between shippers and suppliers. As invoicing issues with customers arise Mod 0152AV will permit shippers to resolve them with both the customer and the industry via the UNC reconciliation process. Any limitation placed on the industry which is out of step with other provisions in English Law has the potential for seriously impacting individual companies. Corona would argue that this situation should be avoided as it is detrimental to competition and could be particularly harmful for smaller portfolio players.

We trust you find our comments useful and if you have any questions then do not hesitate to get in touch.

Yours sincerely

Mark Pearce