

09 November 2007

Julian Majdanski  
UNC Modifications Secretary  
Joint Office of Gas Transporters  
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Dear Julian

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**Response to Uniform Network Code Modification Proposals:  
0181 Scheduling charges calculation for Gas Flow Days  
22,23,24,25&26 October.**

Thank you for the opportunity to respond to the above Modification Proposal. Gaz de France ESS does not support the implementation of UNC Modification Proposal 0181.

Gaz de France ESS was disappointed at the standard of contingency arrangements in place during the Gemini outage. Communication between National Grid NTS to shippers around the contingency arrangements was poor and the arrangements themselves meant that key deadlines during the gas days concerned were missed or data was misleading, mainly due to an archaic standby procedures.

It is vital that lessons are learned from this process and National Grid should work with it's customers to ensure that robust contingency arrangements are put into place as soon as possible. We ask therefore that there should be a full report, published to the industry into the technical failures that brought about the outage; this report should also highlight process failures and delays that have caused economic damage to shippers and should bring forward clear proposals for the implementation of robust contingency arrangements for the future.

There are likely to be economic consequences for shippers via the balancing and reconciliation processes as a direct result of the Gemini outage which is out of the control of the shippers affected. These costs alone are likely to be punitive. To add penalty charges such as scheduling charges on top of this is not desirable. In the light of there being no, or very poor information available to shippers during the outage period, in our view, all penalty charges for this period should be set to zero.

I trust these comments are helpful, if you have any queries regarding this response please contact me on 0113 306 2104.

Yours sincerely

P. Broom

**Phil Broom**  
**Regulatory Affairs Analyst**  
**Gaz de France ESS**