

Tim Davis Joint Office of Gas Transporters 31 Homer Road Solihull West Midlands B91 3LT

15 April 2008

Dear Tim

Modification Proposal 0196: Alterations to shipper penalties for end user failure to Interrupt

Thank you for the opportunity to comment on the above modification proposal. Corona Energy is in support of the proposal and as such would like to make the following comments.

Corona Energy agrees with the proposer that that the current "5 strikes" rule (failure to interrupt 5 times in one year results in all Users interruptible supply points becoming firm) places a disproportionate level of risk on the User as they have little direct control over the interruption of a supply point.

By removing the "5 strikes" rule from sections TPD G 6.9.6, 6.9.7 and 6.9.8 of the UNC an unduly onerous risk would be removed from the shipper/supplier community. Security of supply would not be affected by this change to the code as the power for Transporters to isolate customers that threaten the safe operation of the system through continued failure to interrupt would remain.

I trust these comments are helpful, if you have any queries regarding this response please contact me on 0208 632 8136.

Yours,

Richard Street*
Regulatory Affairs Manager
Corona Energy

*please note as this letter has been delivered electronically a signature will not be attached