



Mr. John Bradley
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Our Ref.
Your Ref.

2 October 2008

Dear John,

RE: Modification Proposals 0222: "Amendment of Interconnector UK's Minimum Wobbe Limit"

Thank you for the opportunity to comment on this proposal. British Gas fully supports its implementation.

With GB facing an increased requirement for imported gas supplies into the future, it makes sense to ensure that there are no artificial, administrative barrier that could serve to limit or prevent gas importation facilities being utilised to the full, should the need arise. Modification 0222 would appear to tackle such an artificial constraint in relation to IUK's ability to transport gas, by aligning the current lower Wobbe limit with GS(M)R specifications (the upper limit already being aligned to GS(M)R).

With regard to the relevant objectives, we agree with the proposer that in extreme circumstances, where the only gas available at the continental end of the interconnector is at the bottom end of GS(M)R, this change could increase competition between relevant shippers by providing an additional source of gas supply to the market that would otherwise be excluded. This proposal will also benefit GB security of supply.

In respect of environmental considerations, we believe that adopting the Wobbe limit set out in this proposal could make additional gas available to the UK in a very tight supply situation, thereby potentially reducing the need for alternative and more polluting fuels e.g. distillate, to be used in place of natural gas.

Should you have any queries with regard to this response please do not hesitate to contact me.

Yours sincerely,

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Chris Wright
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