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6th October, 2008.

Your Reference: Modification Proposal 0222.

Re: Modification Proposal 0222: 'Amendment of Interconnector UK's Minimum Wobbe Limit.

Dear John,

Thank you for your invitation seeking representations with respect to the above Modification Proposal.

National Grid Gas Distribution plc (NGD) would like to offer support for this proposal.

Modification Proposal 0165V "Change to Measurement Provisions Change Process", allowed the permitted measurement ranges within the Measurement Provisions of a NEA or NExA to be increased without the need for written permission of all Users at the System Entry/Exit Point, or a Uniform Network Code Modification Proposal, which was the position before implementation of Modification 0165V. The current Modification Proposal aims to reduce the minimum limit of the Wobbe Index to be consistent with the figure of 47.2 MJ/m³ as set out in the GSMR, and is not therefore covered by the change introduced by 0165V.

For the avoidance of doubt NGD believes that it is appropriate to amend the Interconnector Agreement as described above, in relation to both the entry and exit provisions.

The intent of this Proposal is consistent with the facilitation of A11.1 (d) ... *the securing of competition: between relevant shippers...* by bringing the IUK into line with the majority of other ASEPs and NTS Exit Points. It is also consistent with A11.1 (e) ..*the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards ... are satisfied as respects the availability of gas to their domestic customers.* Implementation of this Modification Proposal would facilitate sourcing gas from the Continent as necessary, by removing an unnecessary barrier.

Please contact Alison Chamberlain on 01926 653994 (alison.chamberlain@uk.ngrid.com) should you require any further information with respect to the above.

Yours sincerely

Richard Court
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