

Joint Office of Gas Transporters
First Floor South
31 Homer Road
Solihull
West Midlands
B91 3LT



ES Pipelines Limited
Hazeldean
Station Road
Leatherhead
Surrey
KT22 7AA

T: 01372 227560
F: 01372 377996

Info@espipelines.com
www.espipelines.com

6 November 2008

Dear Sirs

Modification proposal 0226: Additional date requirements for the administration of CSEP supply points

Thank you for the opportunity to comment on the above consultation. I respond on behalf ES Pipelines, ESP Pipelines, ESP Networks, and ESP Connections, each a licensed independent Gas Transporter whose relationship with the upstream transporter is governed in some operational areas by Annex A of the CSEP NExA.

ESP supports the proposed modification and believes that it is one of a number of incremental changes that will help to the bring xoserve's portfolio in line with ESP's.

ESP has been including the additional reference number for some months, and although there has not been enough time to fully assess the benefits of doing so, there is no reason that this should not be formalised at this point. We are interested to understand the impact that this change has and may continue to have, and so welcome continued analysis by xoserve in this area.

The proposal also lays the foundation for properly functioning flows from nested networks in a manner that iGTs have been advocating for some time.

ESP will require some time to make system changes due to the proposed change in file format. We are currently unable to be more specific than this and would welcome sight of the revised file format, validation rules, and changes to wording of Annex A at the earliest opportunity. It would also be helpful to understand what the proposed acceptance/rejection file for LSP submissions might look like.

Yours faithfully

David Speake

ES Pipelines Ltd