

24th April 2009

The Joint Office of Gas Transporters
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West Midlands B91 3QJ

BOC Operations Centre
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Brinsworth
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FAO Tim Davis

Dear Sirs,

UNC Draft Modification 244, 244A, 244B

Thanks you for inviting comment on these three changes.

BOC supports the introduction of Mod 244, believing that the fixed capacity charges associated with large Industrial users of gas should be open to alteration in a structured manner, but on a timescale that is much more immediate than that currently permitted.

The proposed change offers several advantages to consumers and to their supply chain:

- Consistency of approach between DM and NDM sites
- Cost allocation in line with current economic conditions, not those of 2006/7
- Improved system planning/ utilisation based on real demand not historic
- Reinstates some of the flexibility removed by the farce of Interruption regime change

BOC does not support either of the amendments 244A and 244B, as they

- overly constrain Customer flexibility
- delay implementation of new charges
- appear to over-complicate this straightforward concept, in a manner that will detract from the timeliness and accuracy of information needed by Shippers
- fail to address the question of a temporary zero requirement from a site

In the interest of conciseness, BOC will not submit a fully detailed analysis, believing Gazprom's response already covers these, and many other points accurately and comprehensively.

I trust that this input is of value, and look forward to the implementation of Mod 244 as soon as possible.



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