

Mr. John Bradley  
UNC Panel Secretary  
Joint Office of Gas Transporters  
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31 Homer Road  
Solihull  
West Midlands  
B91 3LT

12 June 2009

Dear John,

**RE: Modification proposal 0250 – “Introduction of the Code Contingency Guidelines Document”**

Thank you for the opportunity to respond to this consultation. British Gas Trading supports the implementation of this modification proposal.

It became evident following the major Gemini outage of Q4 2007 that a number of active shippers struggled with the existing contingency arrangements – either in understanding what was required and/or acting and communicating in accordance with contingency requirements. Following on from that, Review Group 0217 was formed with a remit to assess how matters could be improved. Proposal 0250 is largely the output from that Review Group.

We agree with the proposer of 0250 that the proposed arrangements are an improvement on the current arrangements, and agree with the proposer’s assessment of how this proposal better facilitates the relevant objective.

However, in addition, we are reminded that following the 2007 Gemini outage proposal 0181 was raised in order to try and retrospectively change certain UNC calculations for those relevant gas days. We believe that the additional certainty provided by the implementation of 0250 would significantly lessen the likelihood of similar proposals being raised should a further Gemini outage occur, and therefore implementation would better facilitate A11.1(f) – efficiency in the administration of the uniform network code.

Please contact me if you would like to discuss this response

Yours sincerely,

Chris Wright  
**Commercial Manager**