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Bob Fletcher Joint Office of Gas Transporters 51 Homer Road Solihull, B91 3QJ

7th January 2011

Dear Bob

Re: Modification 0346 An Alternative to the Supplier Energy Theft Scheme Based on Throughput

Please find attached Gazproms response to Modification 0346. We are happy for our comments to be shared with other interested parties.

Gazprom **does not support** Modification Proposal 0346 An Alternative to the Supplier Energy Theft Scheme Based on Throughput and we would refer you to our comments made in respect of modification 0277.

We have been participated in the development of a number of approaches to addressing theft of gas including modification 0277 and modification 0274 Creation of a National Revenue Protection Service. While we recognize the concerns set out in the proposal we believe that the implementation of a National Revenue Protection Service (NRPS) is a more appropriate solution.

I trust these comments are helpful. If you have any queries regarding this response please do not hesitate to contact me directly.

Yours Sincerely

Steve Mulinganie Regulation & Compliance Manager