



John Bradley  
Joint Office of Gas Transporters  
Ground Floor  
51 Homer Road  
Solihull  
B91 3QJ

**Direct line: 020 7257 0132**

**amrik.bal@shell.com**

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Dear John

**Re: Modification Proposal 0265: Creation of a NTS Entry Capacity Retention Charge within the Uniform Network Code**

The following brief comments are offered on Shell Gas Direct Ltd (SGD), a licensed gas shipper and supplier. Please note that this response is not confidential.

Considered on its own, Modification Proposal 0265 seems a logical and sensible step towards implementing *an* entry capacity substitution mechanism. SGD can therefore support implementation of this proposal.

However, this comment should not be interpreted in anyway as indicating support for the Retainer or Option Approach as the basis for the proposed substitution mechanism itself.

Please do not hesitate to contact me should you have any queries or require clarification regarding any aspect of this response.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'Amrik Bal', is located below the 'Yours sincerely' text.

Amrik Bal  
**UK Regulatory Affairs Manager, Shell Energy Europe**