



Bob Fletcher  
UNC Panel Secretary  
31 Homer Road  
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Dear Bob

**Gazprom Marketing & Trading Response to Draft UNC Modification Report 0285: Use It Or Lose It (UIOLI) Interruptible Capacity only to be released when there is at most 10% unsold firm entry capacity**

Gazprom Marketing and Trading Limited ("Gazprom") welcomes the opportunity to comment on the UNC0285 draft modification report. Gazprom do not support modification 0285 as currently drafted.

In particular, Gazprom are extremely disappointed with the exclusion of Day Ahead Auctions (DADSEC) from the calculation of the at the most 10% unsold figure. We believe it is necessary to include the daily firm entry capacity to correctly reflect the unsold quantity, which determines whether interruptible capacity is to be released.

Gazprom would like to request further information from National Grid. It would be extremely helpful to get an indication of how frequently the at most 10% unsold figure is likely to be achieved as a consequence of the inclusion of day ahead firm entry capacity? If the frequency is high, a solution with regards to the timing of day ahead auctions, the allocation of interruptible capacity and potential system changes needs to be considered. However if the occurrence is rare, then a manual solution is sufficient.

To conclude, Gazprom believes the quantity of day ahead capacity sold needs to be considered in the at most 10% unsold figure to truly reflect the correct status of the unsold quantity. The exclusion of DADSEC from the unsold figure does not reflect the intention of modification 0285, triggering the release of interruptible capacity when there is at most 10% unsold firm entry capacity at an ASEP.

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I hope the above comments are useful. If you have any queries please do not hesitate to contact me on ++ 44 20 8614 3036 or at [alex.barnes@gazprom-mt.com](mailto:alex.barnes@gazprom-mt.com).

Yours sincerely,

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