

27th April 2010

BD/COM/IMCC/FG/10-028

Modification Panel Secretary
Joint Office of Gas Transporters
Email: enquiries@gasgovernance.co.uk

Dear Sir,

0284 Removal of the Zero Auction Reserve Price for Within-day Daily NTS Entry Capacity (WDDSEC)

TOTAL E&P UK Ltd welcomes the opportunity to comment on the Draft Modification Report. In accordance with our responses to Ofgem's NTS GCD 08 (NTS Entry Charging Review) and NTS GCM 19 (Removal of NTS Daily Entry Capacity Reserve Price Discounts) consultations, we strongly support Code Modification 0284. We believe that prompt removal of the zero auction reserve price for WDDSEC is an important first action amongst a suite of measures designed to reduce the level of the TO Entry Commodity charge in a bid to avoid cross subsidies created when this commodity charge represents a significant proportion of TO entry revenue.

We support National Grid's proposal that the zero auction reserve price for WDDSEC be removed from the UNC and that the reserve price be set out in the NTS Transportation Statement and calculated in accordance with the NTS Charging Methodology Statement. We agree with National Grid's assertions in section three of the Draft Modification Report regarding the extent to which implementation would better facilitate the achievement (for the purposes of each Transporter's License) of the Relevant Objectives. Similarly, we agree with National Grid's analysis of advantages of implementation as detailed in section eleven of the Report.

We trust that these comments are useful and look forward to hearing the Modification Panel's recommendation regarding this proposal.

Yours sincerely

(by email)

Iain McCombie
Commercial Operations Manager
TOTAL E&P UK Ltd.