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Bob Fletcher
Joint Office of Gas Transporters
51 Homer Road
Solihull
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11th February 2011

Dear Sir / Madam,

Re: Modification 0339 / 339A Clarification of the AUG Year in respect of UNC Modification 0229

Please find attached Gazprom Marketing & Trading Retail (Gazprom) response to Modification 0339 / 339A Clarification of the AUG Year in respect of UNC Modification 0229. We are happy for our comments to be shared with other interested parties.

Gazprom **does not support** Modifications 0339 / 339A Clarification of the AUG Year in respect of UNC Modification 0229

Gazprom believe that Modification 0229 was clear in its intent and scope and that retrospection of any nature was not inherent within the proposal.

The subsequent arrangements under Modification 0317 provide for a provision of £2.75m to be utilised until the AUGE delivers its AUGS report and we believe this is an appropriate and proportionate approach. We do not believe that these modifications “correct” Modification 0229.

Should you have any queries on our response or wish to discuss any aspect of our response please don't hesitate to contact me.

Yours Sincerely

Steve Mulinganie
Regulation & Compliance Manager