

Mr. Julian Majdanski
Joint Office of Gas Transporters
Ground Floor Red
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Solihull
West Midlands
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31 October 2005

Dear Julian,

Modification Proposal 0047 - "Additional Data Requirements for DM Capacity Referrals"

Total Gas & Power Limited (TGP) supports the above modification.

Our comments on the Draft Modification Proposal are as follows:

- The proposal increases the amount of information that must be provided to the Transporter by the Users. Whilst this slightly increases the workload for the User initially it also reduces the amount of subsequent communication between the relevant Transporter and the User and hence result in an overall efficiency saving.

The obligation put upon the Transporter to respond by the 18th Business day ensures that shippers will receive a response in time to confirm to consumers whether the increases have been approved. This will reduce the number of capacity overruns on the network. The modification therefore fulfils the "relevant objectives".

- Though this modification does place some standards of service on Transporters, Users are still liable for any costs (from capacity overrun and ratchet charges) that are incurred if the Transporters fail to meet those standards. We would have preferred to have seen suitable safeguards to protect Users from incurring such unwarranted financial penalties.
- Whilst we agree with the majority of the proposed legal text, we disagree with the proposed definition of "Annual Load Profile" however. The Transportation Principal Document already contains a separate definition of this term in Section H2.3.1. Whilst we acknowledge that there are multiple definitions of the same term within the UNC (such as "relevant") we would prefer the use of a distinct phrase to avoid confusion. We therefore suggest "Monthly Load Profile".

Should you wish to discuss our response further, please feel free to contact me.

Yours sincerely,

(This message is sent electronically and is therefore not signed)



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