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Julian Majdanski
Joint Office of Gas Transporters
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Dear Julian

7th October 2005

We welcome the opportunity to comment on Modification proposal 038, Optional limits for inert gases at System Entry Points.

Northern Gas Network offers its qualified support for this Modification proposal in its aim of allowing Delivery Facility Operators to request the inert gas limits at System Entry Points at the levels specified within the Modification proposal.

We concur with the view that implementation would better facilitate the Relevant Objectives set out by the proposer, and would add that it similarly satisfies Standard Special Condition A11 (f) in that it avoids multiple Modification proposals to allow each separate request at various entry points.

One potential effect of this proposal would be an increase in the molecular weight of transported gas. This may affect the energy required at compressor stations to deliver gas to the network, however from a practical perspective it is unlikely that such changes could be related to the molecular weight of gas. It may be prudent for Network operators however to consider any revised weight of gas in its Network Planning tools.

The request to extend the deadline for responses to this proposal based on the additional information issued late on the 4th October 2005, highlights the problems faced when proposals are advanced without sufficient planning as to the required information by which the industry can make a considered, informed decision based on the most complete and relevant information available.

NGN did not support the extension of the deadline beyond 7th October 2005 in this instance but would wish to place on record that representations received post this date, specifically addressing the issues raised within the note of 4th October should be given due consideration by the UNC Modification panel when assessing representations received,

Yours sincerely

Robert Cameron-Higgs