

09 January 2006

Julian Majdanski
UNC Modifications Secretary
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Dear Julian

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Uniform Network Code Modification Proposal 0069 – Amendment of Network Entry Provisions at the European Interconnector sub-terminal at Bacton

Thank you for the opportunity to respond to the above modification proposal.

Gaz de France ESS supports the implementation of modification proposal 0069.

This modification proposal, if implemented, would enhance security of supply to UK customers by offering additional volumes of gas and has the potential to help alleviate peak supply concerns for coming winters. Given the current and forecast decline in UKCS deliveries now is an appropriate time to accommodate other sources of gas that could flow to the UK via the European Interconnector at Bacton.

From the analysis provided there seems to be little impact for gas Users resulting from the proposed changes to increasing the contractual Upper Wobbe limit and Total Sulphur allowance, both of which remain within GS(M)R levels.

Gaz de France ESS is supportive of the way in which this modification proposal was developed. Discussions with relevant parties, such as CCGTs, industrial consumer groups and the Environment Agency early in the process have led to impacts being clearly identified and quantified wherever possible. This is a helpful approach, which allows for issues to be aired and analysis provided during the development phase and this should be encouraged for future modification proposals.

Gaz de France ESS agrees with the proposer that this modification proposal better facilitates the relevant objective A11.1d *securing effective competition between relevant shippers and suppliers* by attracting additional gas supplies to the UK. Also, A11.1a to better facilitate *effective and efficient operation of the NTS pipeline system* by ensuring that existing pipeline capacity can be fully utilised.

If you have any queries regarding this response please contact me on 0113 3062104.

Yours sincerely



Phil Broom
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Gaz de France ESS