



Mr J. Majdanski
Secretary, Modification Panel
Joint Office
National Grid Gas

Centrica Energy
Millstream East
Maidenhead Road
Windsor
Berkshire
SL4 5GD

Tel. (01753) 431242
Fax (01753) 431150
Our Ref.
Your Ref.

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Dear Julian,

RE UNC Modification Proposal:- 0098/0098a Modification to Codify Emergency Curtailment Quantity (ECQ) Methodology

Thank you for the opportunity to comment on these Modification Proposals.

British Gas Trading is supportive of the implementation of Modification Proposal 0098 and therefore does not support the implementation of the alternative Proposal 0098a.

One of the principle aims of the inclusion of this methodology within recognised industry governance is to ensure, as far as is possible, the uniform and consistent approach to the calculation of ECQs across all parties with responsibility for such calculation. This tenet upholds the securing of effective competition as is required by licensees. This is clearly the intent of Modification Proposal 0044 in the form it was approved for implementation by Ofgem.

On balance we feel that the inclusion of this process within the UNC, rather than as an ancillary document, provides for greater certainty of this consistency. It is recognised that inherent in this approach is a greater degree of complexity when changes are proposed but this is an acceptable constraint to achieve consistency.

We are also of the opinion that the inclusion of Nomination quantities within the ECQ calculation is an essential requirement as these are often the most accurate figure of proposed offtake volumes. We support the proposed order of ranking of these various sources of information as we believe that this represents the more reliable sources as the preferred choice.

Please contact me if you require any further information.

Yours sincerely,

Mike Young
Commercial Manager

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