

11 September 2006

Julian Majdanski  
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Dear Julian

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### **Uniform Network Code Modification Proposal 0100 – Amendment to OPN/SFN Submission Times**

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

Gaz de France ESS **does not support** the implementation of this modification proposal.

In this modification proposal it is claimed that by bringing forward the initial OPN/SFN submission times from 1700 D-1 to 1200 D-1 this will increase the quality of information available to National Grid NTS to provide more accurate demand forecasts. Whilst we support the requirement to forecast accurately it is not clear how this proposal will facilitate this.

There has been no analysis provided as to how this information would be better than the DM output nominations currently provided by shippers at 13.00. Indeed, in the proposal itself National Grid seem unconvinced of the merits; “earlier provision of the data does not guarantee continued accuracy of the data” which re-enforces points made by shippers and storage operators at Transmission Workstream on 3 August 2006. For this reason the proposal may actually be counter-productive for demand forecast accuracy and in light of this uncertainty we cannot support the view that this will better facilitate relevant objective A11.1a “the efficient and economic operation of the pipeline system”.

Changing submission times will disturb current shipper processes and result in additional costs resulting from system changes and increased administrative burdens. Contract changes may be required between shippers and large consumers/storage operators to accommodate the proposed changes, imposing costs on these parties. The cost burden associated with these changes would be detrimental for relevant objective 11.1d “promoting effective competition between shippers and suppliers”.

I trust these comments are helpful, if you have any queries regarding this response please contact me on 0113 306 2104.

Yours sincerely



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**Gaz de France ESS**