

11 September 2006

Julian Majdanski
UNC Modifications Secretary
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Dear Julian

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Uniform Network Code Modification Proposal 0101 – Amendment to demand forecasting timings in relation to the Gas Balancing Alert

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

Gaz de France ESS gives **qualified support** to the implementation of this modification proposal.

We welcome the proposed changes to section H of the UNC to include the publication times that reflect current operational practice and this better facilitates objective A11.1f “the promotion of efficiency in the implementation and administration of the UNC”.

Gaz de France ESS also support the principle that early notification of a GBA gives Users and consumers more opportunity to take demand side actions to reduce the likelihood of a Gas Deficit Emergency being called. We therefore agree with the proposer that this modification proposal would further relevant objective A11.1a “the efficient and economic operation of the pipeline system” by facilitating increased notification and lead times to Users at D-1. Also, the potential for increased lead times via early notification may increase the take up of commercial interruption contracts as short notification times can often act as a deterrent to demand side participation. Hence it is likely that implementation of this proposal will enhance competition between shippers and suppliers of commercial interruptions products in the Industrial and Commercial market therefore furthering relevant objective A11.1d.

One area of concern we have around this proposal centres on the communication of information. Whereas we welcome the potential to provide information earlier, extra communication channels are required to alert Users and customers to reap the full benefits of this proposal. Our qualification here is that the planned roll-out of SMS messaging, to alert relevant parties of major system events, is essential to support the implementation of this proposal.

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

Yours sincerely



Phil Broom
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Gaz de France ESS