British Gas

Centrica Energy

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Dear Julian,

RE: Draft Modification Report 0110: "Amendment of Px's Network Entry Agreement".

Thank you for the opportunity to comment on this draft modification proposal.

British Gas Trading (BGT) recognises the strong parallels with the recently approved modification 0093. However, unlike modification 0093, as well as setting out the administrative change necessary to enable the Px sub-terminal to utilise its increased physical capability, we understand that this proposal also seeks to correct an error which is contained within Px's current NEA.

We refer to line 3 of the data table set out on page 1 of the draft modification report. This shows the Energy Flow Rate as being revised upwards by a significantly greater increment than the other measurement revisions set out therein. The proposer has confirmed that the revised figure is correct, and that the current figure is understated by a significant margin. We believe that it would have added weight to this proposal had this point been set out clearly in the original proposal and in the draft modification report.

BGT's only reservation – a point which is not specifically addressed in the draft modification report - is to ensure that the metering assets are capable of operating accurately within the revised meter ranges set out in the draft NEA, and are rated to do so. To this end, we would welcome sight of the uncertainty calculations that accompany this revision.

Providing the above comment with regard to acceptable accuracy is satisfied we would point towards the obvious security of supply benefits, which in turn better facilitate the relevant objectives at A11.1(a), (d), and (e) of the Transporters Licence, as reasons why this change should be implemented as soon as practicable. We also believe that correcting the existing error within Px's NEA promotes efficiency in the administration of the network code, since the NEA will now be accurate.

Please don't hesitate to contact me if you have any queries about this response.

Yours sincerely

Chris Wright
Contracts Manager