

12 October 2007

Julian Majdanski
UNC Modifications Secretary
Joint Office of Gas Transporters
51 Homer Road
Solihull B91 3LT

Dear Julian

**Response to Uniform Network Code Modification Proposals:
0174 Revised Tender Timescale for DN Interruption Arrangements.**

Thank you for the opportunity to respond to the above modification proposal. Gaz de France ESS supports the implementation of modification proposal 0174.

The proposed change seeks to change one element of the tender timescales associated with the implementation of Modification 0090. In our assessment, delaying the notification of tender results to shippers and customers from mid-July to the end of July has little impact on competition. Many contracts in the Industrial and Commercial market start or renew in October, and July has traditionally been a busy month where these contracts are finalised. Having said that, a delay of two weeks to publish the results should not inhibit competition between suppliers as interruptible terms are designed to transfer with the customer.

Gaz de France ESS are pleased that the original draft of this proposal, which looked to bring forward the tender dates, was changed to allow the front end of the tender timescales to remain in line with shipper and customer expectations.

Gaz de France ESS agrees with the proposer that implementation of this modification proposal would better facilitate Standard Special Condition A11.1a "the efficient and economic operation of the pipeline system". The additional time allowed should allow for the DNs to make a more informed decision about their most efficient course of action within their area. This is also pertinent to the DNs when assessing their requirements for NTS offtake capacity ahead of the annual application window. In this respect the modification proposal also better facilitates SSC A11.1b "the economic operation of the combined pipeline system".

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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