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Dear Julian

UNC Code Modification Proposal 0181 'Scheduling Charges calculation for Gas Flow Days 22, 23, 24, 25 and 26 October 2007'

Shell Gas Direct (SGD) Ltd, the holder of both gas supplier (non-domestic) and shipper licences respectively, offers the following comments in response to this proposal. This response is not confidential and may be placed on your website.

Given the shortened consultation period, it is not possible to submit a detailed response. However, for the avoidance of doubt, SGD supports implementation of this proposal.

Proposal 0181 seems a proportionate and sensible response following the impact on scheduling charges of the unavailability of Gemini. Moreover, SGD agrees that this proposal could reasonably be argued to help secure effective competition between relevant shippers (SSC A11 1(d)).

Implementation of Proposal 0181, however, should not detract from an extensive consideration of the admittedly separate but nevertheless related issues of:

- a) the factors that caused the the unavailability of Gemini and the question of NG NTS' liabilities; and
- b) the adequacy of the Contingency arrangements.

Please do not hesitate to contact me if you wish to discuss this matter further.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'Amrik Bal', is located below the 'Yours sincerely' text.

Amrik Bal
UK Regulatory Affairs Manager, Shell Energy Europe