

Eni UK

Eni UK Limited

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NSGP/LET/UNC0194-pro/ys//08

24 October 2008

John Bradley
Panel Secretary
Joint Office of Gas Transporters
First Floor South
31 Homer Road
Solihull
West Midlands
B91 3LT

Dear John

Response:

Support for Implementation of Modification Proposal 0194A “Framework for correct apportionment of LSP unidentified gas”

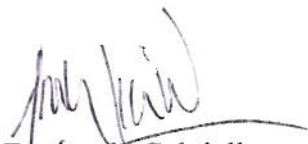
Non Support for Implementation of Modification Proposal 0194 “Framework for correct apportionment of NDM error”

Eni UK Limited (Eni) welcomes this opportunity to respond to these modification proposals. In principle Eni supports draft proposal 0194a. We believe it addresses the issue in a more clear and transparent way, whereby the I&C market would make an appropriate contribution in relation to the level of unidentified gas in the LSP market.

As an I & C gas supplier we agree that theft does occur in the I & C market. However, we believe the proposed changes as presented in 0194 would not only increase the bills of I & C customers, but also substantially impact on the business model operated by every I & C supplier active in the market today. Therefore we do not support proposal 0194, on the basis that it would not facilitate an appropriate method to resolve the issue of missing gas and the allocation of associated costs.

We hope our comments will be given due consideration before a final decision is made with regards to the implementation of either proposal.

Yours sincerely



Emanuele Calviello
North Sea Gas & Power Business Manager