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Julian Majdanski
UNC Modification Panel Secretary
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
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5th June 2008

Dear Julian

Modification Proposal 0202: Improvements to More Frequent Reading Provisions to allow benefits of AMR

Gazprom Marketing and Trading Retail (GM&T-Retail) welcomes the opportunity to comment on modification proposal 0202. GM&T-Retail fully supports the implementation of this proposal.

GM&T-Retail believes that there are significant benefits to be derived for Shippers, Customers and the Gas Transporters (GTs), through permitting greater use of reads generated by Automatic Meter Reading (AMR) for Small Supply Points. Increasing the number of AMRs provided by Shippers to the GTs, from the current quarterly basis to a monthly basis, improves data accuracy leading to improvements in billing of both transportation and energy charges. As a result, this proposal will allow Suppliers to produce accurate bills for Consumers' energy usage. The RbD process will also directly benefit from improvements in data accuracy as energy will be more accurately allocated between the market sectors. Finally, Monthly Reads will improve the GTs ability to accurately forecast network usage, allowing them to more accurately predict their future requirements from the NTS. This will help ensure that the GTs make the most efficient investment decisions for the UK network as a whole.

To conclude, we believe that this proposal is in the best interest of numerous industry participants through reductions in the volume of gas settled via the RbD process. The modification proposal is also in line with the Government's longer term expectation that smart meters would be provided to all business and domestic customers over the next decade. By allowing the Small Supply Points to be Monthly Read and allowing Customers to derive the benefits gained from accurate billing others will be encouraged to install AMR technology, contributing towards meeting the Government's target.

Please do not hesitate to contact me if you wish to discuss any of the points raised in this response.

Yours sincerely

A handwritten signature in black ink, appearing to read "Glenn Nixon".

Glenn Nixon
Gas Operations Manager
Gazprom Marketing & Trading Retail

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