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Our Ref.
Your Ref.

6 June 2008

Dear Julian,

RE: Modification Proposal 0211: "RbD Audit Governance Arrangements"

Thank you for the opportunity to comment on this proposal. British Gas supports its implementation.

A high level summary of our understanding is that the current RbD audit process is designed to check that Transporters are applying the correct RbD related calculations to the data inputs that they receive. This process has been applied on a sufficient number of occasions, and with a sufficiently clean bill of health, that British Gas has confidence that Transporters are complying with the provisions of the UNC in this respect.

We are not aware of any significant changes that have taken place to Transporters' RbD related calculation procedures over the last year which could have led to a degradation of such calculations, and it would therefore seem inefficient and unnecessary to continue to conduct an expensive audit on a process in which there is generally a high degree of confidence.

Of much greater interest to us, however, is the potential to extend the scope of the audit to include an assessment of the *inputs* to the RbD calculations, since it is here where we believe greater accuracy can be gained.

We welcome the revised proposal under this modification whereby a majority vote of the UNCC is required in order for the RbD audit to remain suspended in future years, and believe this provides a welcome safeguard for the shipper community.

We agree with the proposer that this revised RbD audit governance arrangement will result in the promotion of efficiency in the administration of the Uniform Network Code.

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Should you have any queries with regard to this response please do not hesitate to contact me.

Yours sincerely,

Chris Wright
Commercial Manager