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9th June 2008.
Your Reference Modification Proposals 0216 & 0216A

Re: Modification Proposals 0216 & 0216A: Introduction of an Additional Discretionary Release Mechanism for NTS Entry Capacity and Introduction of Additional Pay-as-Bid Auctions for NTS Entry Capacity

Dear Julian,

Thank you for your invitation seeking representations with respect to the above Modification Proposals.

National Grid Gas Distribution plc (NGD) would like to offer support for both of these proposals on the basis that their intent is consistent with the better facilitation of A11.1(a) .. the efficient and economic operation of the pipeline system ...; and A11.1(d) the securing of effective competition ...

Both proposals offer the opportunity for further entry capacity to be made available to the market and thus potentially avoid the stranding of gas offshore. On the basis that 0216 is less restrictive in terms of the timing, mechanisms and the product flexibility UKD believes it has more merits and is more likely to protect against further urgent modification proposals next winter.

UKD does not agree with the need to put an end date to either modification proposal. It is clear that this is an evolving process and National Grid NTS has agreed to undertake a review of each capacity release that is undertaken and an annual review of the overall process.

If you have any queries in relation to this representation please contact Alison Chamberlain 01926 653994.

Yours sincerely

Alan Raper
Customer Contracts and Regulation Manager