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By email: enquiries@gasgovernance.com

Dear Tim

Re: Total Gas and Power response to Modification proposals 228 and 228a

Total welcomes the opportunity to respond to the two modification proposals.

In our response to modification 194 we gave strong arguments as to why the RBD volume does not have a direct correlation with the issues associated with unidentified gas. Any allocation made back to the LSP sector based upon this RBD volume is therefore fundamentally flawed.

As both of these modifications are using RBD volumes as the basis on which to calculate this allocation back to the LSP sector, be it variable (228), or fixed (228a), both of these modifications are therefore also fundamentally flawed.

To this extent Total does not support either modification.

Total does support an independent review to establish a “best estimate” of the size of the unallocated gas issue.

Yours sincerely

Richard Dutton
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