



Tim Davies
Joint Office of Gas Transporters
Ground Floor
51 Homer Road
Solihull
B91 3QJ

Shell Gas Direct Ltd
1-3 Strand
London
WC2N 5EJ
United Kingdom
Tel +44 0207 257 5874
Internet <http://www.shell.com/gasdirect>

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Dear Tim

Re: Modification Proposal 0242 – Changes to the window for the submission of Valid Meter Readings

Thank you for the opportunity to comment on the above proposal. The following comments are offered on behalf of Shell Gas Direct (SGD) Ltd, the holder of both gas supplier (non-domestic) and shipper licences. This response is not confidential and so may be placed on your website.

SGD is supportive of this proposal, provided, as the proposer suggests, that implementation will have no detrimental impact on UK Link performance levels.

Implementation of the proposal could increase the number of Valid Meter Readings available for use in energy reconciliation and AQ calculation processes. This would potentially improve the allocation of energy and transportation charges between Users, allowing for better cost targeting. We believe that this could better facilitate Standard Special Condition A11.1 (d) – the securing of effective competition (i) between relevant shippers; and (ii) between relevant suppliers.

Please do not hesitate to contact me should you wish to discuss these comments further.

Yours sincerely

Jemma Woolston
Industry Operations Analyst, Shell Gas Direct Ltd