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Modification Panel Secretary
Joint Office of Gas Transporters
First Floor South
31 Homer Road
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05 August 2009

Dear John

Re: Modification Proposal 0257: Revision of the Gas Balancing Alert (GBA) Trigger/Safety Monitor

Thank you for providing SGN with the opportunity to comment on the above Modification Proposal. SGN supports implementation of this Modification Proposal.

Gas Balancing Alert is in place in order to provide a signal to the market that demand-side reduction or additional supplies may be required to avoid the risk of entering into a Network Gas Supply Emergency. Currently National Grid NTS provide information to the industry with regards to stock levels on 3 types of storage; long, medium and short range. If one type of storage facility goes below the stock level a Gas Balancing Alert is triggered. SGN understand that this proposal aims to continue providing information for the 3 storage types; however, information on aggregated stock levels for all 3 types of storage facility would also be provided and a GBA Trigger set. If one type of storage facility were to fail in this case a trigger would not be raised as the aggregated levels would be adequate.

SGN consider implementation of this proposal may provide greater clarity of the remaining storage position and consequently provide the industry with increased transparency of supply/demand assumptions and storage levels. Furthermore, it may provide the industry and system operator with better signals which may improve decision making processes linked to market responses required to alleviate any risk for potential Gas Deficit Emergency. Therefore it supports relevant objectives Standard Special Condition A11.1 (a): the efficient and economic operation of the pipeline system and Standard Special Condition A11.1 (d): the securing of effective competition: (i) between relevant shippers; and/or (ii) between relevant suppliers.

We hope you find these comments helpful.

Yours sincerely



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