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RE - Consultation on the NTS Exit Capacity Release Methodology Statement (ExCR) in Respect of the Transitional Period

Dear Andrew,

British Gas Trading welcomes the opportunity to comment on the proposed changes to the NTS Exit Capacity Release Methodology Statement.

The modification proposal raised by RWE identified a situation whereby a User (re developer) could not be guaranteed to secure existing or incremental exit capacity with a lead time request greater than 6 months. Even if the User requested the capacity well in advance it could lose the capacity to other Users who might also request the capacity but within the 6-month required lead time.

Essentially, the issue is one of enabling longer lead time requests for securing or registering existing exit capacity or incremental exit capacity (not requiring or not allowing sufficient time for specific reinforcement) during the transitional period before enduring offtake arrangements are established. British Gas Trading agrees that such an arrangement is appropriate and therefore supports the changes being proposed to the Statement.

We note that ARCAs have to date been individually negotiated and parties have had recourse to the Authority in the event of disputes. This principle has been retained for the envisaged additional use of ARCAs and should therefore remain consistent.

Should you wish to discuss this response I can be contacted by e-mail at graham.jack@centrica.com

Yours sincerely,

Graham Jack
Commercial Manager