

March 13, 2006

Aidan Bugler
Bord Gais Eirann
PO Box 51
Gasworks Road
Cork
Ireland

Millstream East
Maidenhead Road
Windsor
Berkshire SL4 5GD
Telephone 01753 431000
Facsimile 01753 431010
www.centrica.com

Dear Aidan,

Re: Transportation NWC Proposed Modification 3

British Gas Trading (“BGT”) welcomes the opportunity to comment on this proposed modification.

Although BGT is not party to the BGE Network Code we feel that it is important to convey our views on this matter given that any changes to the BGE Code must be considered in the context of the entire postalised network..

As previously communicated we do not agree with the original modification and can only assume from the Initial Modification Report that BGE(NI) are proposing an alternative modification to that submitted by Firmus Energy. We feel that this alternative is sufficiently removed from the original that it should be treated as a new modification and not consulted on further in the context of Modification 3.

The principles behind the Code are that gas is transported in a multi-shipper environment with no targeting of costs or incentives based on shipper behaviour. In reality very few shippers have any control whatsoever as to the accuracy or not of their allocations in fact they are unable to submit differing entry and exit nominations. To this extent it would be inappropriate for a transporter to implement either of the modifications.

To conclude British Gas Trading does not believe either the original modification or the BGE (NI) version should be implemented and would expect to see the amended modification submitted as a separate proposal

Should you wish to discuss these issues further then please do not hesitate to contact me.

Yours Sincerely,



Keith Sanderson
Commercial Manager