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> Your ref: Our ref:

Date: 6 June 2005

Dear Kevin

THE PROPOSED ACQUISITION OF EAST SURREY HOLDINGS PLC BY KELLEN ACQUISITIONS LIMITED – IMPLICATIONS FOR PHOENIX NATURAL GAS LIMITED

Thank you for the opportunity to see the above Consultation Paper by the Northern Ireland Authority for Energy Regulation.

There is nothing in these proposals that would impact on Roads Service business and I have no comments to make on this issue.

Yours sincerely

DAVID ORR

Director of Network Services



