

Mr Bob Fletcher
Secretary, Modification Panel
Joint Office of Gas Transporters
51 Homer Road
Solihull
B91 3LT

2nd November 2012

RE: UNC Modification 427S - Estimated Opening Meter Reads Code Amendment

Dear Bob,

British Gas supports the implementation of UNC Modification Proposal 427S.

This modification proposal brings industry code into line with industry practice of accepting reads up to 10 days. This proposal safeguards industry party processes and mitigates the risk of future changes that may restrict the acceptance of files to 7, 8 or 9 days. Any changes to the current window will require system changes and increase costs to Shippers as a consequence, with no gain to customers.

British Gas believes that 10 days is an adequate time period for allowing reads to be exchanged between parties. Guaranteed longer meter read window facilities greater volumes of actual reads through the Change of Supply process. The extended window ensures that any reads that fail validation are more likely to be amended in time to be correctly resubmitted. We believe this proposal will benefit the industry and also good for customers.

Furthermore this proposal promotes efficient administration of the code by aligning the IGT UNC 048 modification proposal to the UNC 0427 code proposal.

If you have any questions regarding the response from British Gas, please do not hesitate to contact me directly.

Kindest regards,

Andrew Margan
(07789 577327)

British Gas