

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

3rd August 2010

Dear John

RE: UNC Modification Proposal 0297 – “*Extending Rights to Protect Information Provisions for Meter Asset Managers / Registered Metering Applicants*”

British Gas supports the implementation of this modification proposal and believes that implementation will be of benefit to Meter Asset Managers (MAMs) and Network Owners alike, consequently aiding the Suppliers who are served by them.

Like Scotland Gas Networks, we too recognise that MAMs sometimes need to be able to establish key information relating to the site to which they are appointed in order to operate. We agree that the current Uniform Network Code (UNC) rules in this area are too restrictive and therefore hinder the MAMs ability to commercially operate, potentially increasing costs for Suppliers in the market.

We also consider that there is benefit for Suppliers in their appointed MAMs being able to validate metering information with the Network Owner, reducing the instance of data errors within their own systems and therefore improving the service which they offer customers.

For these reasons we agree with the proposer that the modification proposal meets the UNC relevant objectives, specifically:

Standard Special Condition A11.1 (d): so far as is consistent with subparagraphs (a) to (c) the securing of effective competition: (i) between relevant Suppliers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant Suppliers;

For the reasons given above, this modification proposal will allow MAMs to better enter in to commercial arrangements with Suppliers, thereby reducing their risk and leading to more accurate charging to those Suppliers. This in turn will improve Suppliers ability to compete with each other.

If you have any queries relating to this representation, please do not hesitate to telephone me on (07789) 570501.

Yours sincerely

David Watson
Regulatory Manager, British Gas