

Mr. Julian Majdanski
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
Solihull
West Midlands
B91 3QJ

20 July 2005

Dear Julian,

Modification Proposal 0005 - "Provision of a Guarantee of Pressure for Meter Points operating above 21 mbar by the relevant transporter "

Total Gas & Power Limited (TGP) supports the above modification.

With multiple DN owners appropriate safeguards are essential for existing customers to provide surety that commercial decisions made by Transporters will not adversely affect their operations. We do not envisage any major changes to network operations as a result of this modification as we would assert that Transporters have already agreed to provide and maintain enhanced pressures when their engineers have set onsite configurations. This modification merely formalises an existing process. Other informal services have already been mandated within the UNC. Ofgem approved modification 717 as it provided greater governance of a key service to Users¹; this modification provides governance for the pressure regime. If giving such formal safeguards suddenly jeopardises operations, we would have serious concerns about current network management

As presumably the current distribution system is operated within safe parameters, there will be no additional costs incurred by Transporters as adequate monitoring equipment and appropriate system redundancy should already be in place to ensure efficient network operation. Providing a guarantee that current long term arrangements will not be abruptly discontinued does not require system investment. The minimal costs associated with this modification will be purely administrative and could be absorbed within the current price control revenue.

For the avoidance of doubt, we would like to state our view that such guarantees would not be applicable in an emergency situation and that we would expect that any new connection would pay for any system improvements as per the previous arrangements.



¹ Ofgem decision response "Modification 717: Provision of a Supply Point Information Service, 27/01/05"

Should you wish to discuss our response further, please feel free to contact me.

Yours sincerely,

(This message is sent electronically and is therefore not signed)

Gareth Evans
Regulation Analyst
Total Gas & Power Limited

Direct: +44 (0) 20 7318 6836
E-mail: gareth.evans@total.com



Registered Office: 33 Cavendish Square, London W1G 0PW
Tel: 0870 5275 215, Fax: 0870 5275 213
Registered in England No. 2172239