



Mr J. Majdanski
Secretary, Modification Panel
Joint Office
National Grid Transco

Centrica Energy
Millstream East
Maidenhead Road
Windsor
Berkshire
SL4 5GD

Tel. (01753) 431242
Fax (01753) 431150
Our Ref.
Your Ref.

23 May 2005

Dear Julian

**RE UNC Modification Proposal 0007 (Formerly Modification Proposal 728) –
Provision & maintenance of large firm supply point emergency contact information
by the gas transporter**

Thank you for the opportunity to comment on this Modification Proposal.

Whilst we recognise and endorse the intended objective of this Modification Proposal, we are not convinced that simply passing the responsibility for collecting and maintaining this data to the Transporter is in the best interest of the industry as a whole.

We appreciate the proposer's view that this is data that is primarily required by the Transporter in order to fulfil their obligations under their safety case. However, the provision of this information to support processes that would be followed in an emergency situation is of concern to all players. Additionally, it is only the Supplier that has the contractual relationship with the consumer and through this, access to the required information. Therefore, it does not seem appropriate that Shippers, as Users of the Network Code, are removed entirely from this obligation.

We are of the opinion that it would be more beneficial to clearly identify the appropriate responsibilities for the elements of this process and to place the relevant obligations and incentives upon the correct party. For example, the Transporters, or their agents, do have a clear obligation to validate information, provided to them by Users, and the subsequent updating and maintenance of the database.

Some progress has been made within the Gas Action Task Group (GATG) to this outcome by means of looking at the current procedures, improving customer's knowledge/ understanding, and to develop a more reasoned proposal for improvement.

Although we are supportive of the initiative, we are unable to support this Modification Proposal in its current form.

Page 1

A **centrica** business

British Gas Trading Limited Registered in England No.3078711. Registered Office: Millstream, Maidenhead Road, Windsor, Berkshire SL4 5GD
www.gas.co.uk

Please contact me if you require any further information.

Yours sincerely,

Mike Young
Commercial Manager