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Response to UNC Modification Proposal 007 Provision and Maintenance of Large Firm Supply Point Emergency Contact Information by the Gas Transporter

Dear Tim

E.ON UK supports this proposal. The current regime has been in place since competition in gas supply started and the quality of emergency contact information has been proven to be consistently poor.

We believe this proposal goes some way towards improving the provision and maintenance of Large Firm Supply Point Emergency Contact information, however, we are also aware of work ongoing within the GATG and anticipate further improvements in this area.

Response to specific issues raised by Transco in their Draft Modification Report:

With regards to Transco's recovery of costs of 'managing' Emergency Contact information, Transco carry provisions within their price control for customer services and this could easily be incorporated. If not, and the cost to them exceeds the threshold, then there is nothing to stop Transco from asking for their price control to be re-opened.

Transco claim that only shipper/suppliers can enforce the requirements of provision of information due to their contractual relationship with consumers. It is certainly the case that all consumers should be bound by their supply contract to provide such information, however the reality is that suppliers have very little by way of sanctions to carry out enforcement. The issue is essentially one of safety and minimum disruption to the end consumer, whilst it is acknowledged that all participants have duties around safety, it is the natural perception of consumers that the Transporter is at the heart of gas safety from a Network security viewpoint.

The Transporter has responsibility for the integrity of the Network and has sufficient powers of enforcement on end users under existing legislation for example, where necessary to carry out isolation.

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We do not agree that that proposal would lead to duplication and greater levels of error in the contact data held by different parties. The proposal would, in fact, add clarity in that the database held by the GT would be the 'Master' for the industry to use.

Transco claim that there is no demonstrable likelihood of the accuracy of the data held by Transco being improved by implementation of this Modification Proposal. We disagree. The supplier's relationship with a customer is transient and may only last a year. The relationship between the GT and the customer will last the lifetime of the premises having a gas supply.

This proposal will better facilitate the Relevant Objective, 'the coordinated, efficient and economical operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters', through controlled and efficient co-ordination of the maintenance of Large Firm Emergency Contact information, ensuring greater confidence in the ability of the Transporter to be able to call off firm gas use in an emergency.

Please do not hesitate to contact me if you wish to discuss any of the issues raised in this response.

Yours sincerely

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