

Representation For. 0007(0728)

"Provision and Maintenance of Large Firm Supply Point Emergency Contact Information by the
Gas Transporter"
Version 1.0

Date of Communication: 23/05/2005
External Contact: Simon Howe (RWE Npower Plc)
Slant: Against
Strictly Confidential: No

Abstract

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Mod 007 Provision and Maintenance of Large Firm Supply Point Emergency Contact
Information by the Gas Transporter

Dear Julian,

Thank you for the opportunity to respond on Mod 007. RWE Npower supports the idea of centralising the management of Emergency Contact Information however we are unable to support the implementation of this Modification Proposal for Winter 05/06.

We believe that it is premature to decide whether or not to implement this modification when the Gas Advisory Task Group (GATG) has yet to complete its work and report back to the Gas & Electricity Industry Emergency Committee (GEIEC).

We have concerns that aspects of this modification haven't been thoroughly considered. It is a Shippers/Suppliers licence obligation to supply and maintain this information. Transco have demonstrated that overall current industry performance is poor, however they have stated that some Users are managing their portfolios well. We believe that via the GTAG lessons can be still learnt and improvements made to processes. We feel that by setting up a centralised body to deal with this issue at this time will not resolve the outstanding issues or reduce the poor performance level.

Also, we have not seen any costings for the development of this central management system. To be able to support this proposal we would require full costings for development, testing and implementation of this change.

Therefore we also consider that it isn't practically achievable to implement this modification for Winter 05/06.

I would be happy to discuss any of the issues raised with you.

Yours sincerely,

Simon Howe.
Gas Network Codes Manager