

Representation For. 0087

"Single Centralised On-line Gas Enquiry Service - Removal of redundant UNC provisions"
Version 1.0

Date of Communication: 27/07/2006
External Contact: Beverley Grubb(Scotia Gas Networks)
Slant: For
Strictly Confidential: No

Abstract

SGN fully supports the above proposal on the basis that it would promote efficiency in the implementation and administration of the UNC and by transferring arrangements to SPAA, potentially help promote competition.

Modification Proposal 0087 sets out arrangements for the removal of references to the Supply Point Information Service under the UNC on the basis that such services would in future be better provided for under the Supply Point Administration Agreement (SPAA) and a Single Centralised Online Gas Enquiry Service (SCOGES). This is in line with recommendations made by the Customer Transfer Programme.

SCOGES is intended as a single national online enquiry service, covering all Transporters. It is intended that such a service will be available to all Shippers, Suppliers and some non-domestic customers. SGN believes that such an arrangement would be more transparent, and will provide easier and more immediate access to information for users. In general SGN believes it will be more economic and efficient for all parties. Furthermore, by transferring control and governance from UNC to SPAA it will ensure that parties that utilise and are most affected by the service have direct control over the provision of the service in future. At present, as the UNC sets out arrangements and obligations between Transporters and Shippers only, there is no direct role for Suppliers. We believe transfer of governance to SPAA to be a more appropriate and robust arrangement.

SGN believe that if obligations relating to the service are transferred to SPAA, they should be removed from the UNC. It would not be appropriate to have duplicate provisions in both documents. This would create potential for confusion and ultimately discrepancies. This would not be in the interest of good governance.

We note that under Section 7 of the Draft Modification Report it is suggested that under SPAA those Users whose organisations are not also supplier signatories to SPAA may face increased contractual risk. We do not believe this risk would be significant. As stated elsewhere in the Draft Modification Report, Transporters will continue to have a Licence obligation to provide such services and the Business Requirements Specification for SCOGES is quite clear that the

service should be made available to all Shippers as well as Suppliers. There is no intention to exclude Shippers views or requirements in future.

We note that the proposal also makes reference to changes to the Request for Information (RFI) telephone enquiry facility, E-Mail services and the periodic issue of Supply Meter Point data on CD-ROMs. It is proposed that references to these services also be removed. However we are not clear whether it is intended that changes are made to legal text in the UNC, in addition to those noted for UNC TPD Section G and General Terms Section B. Further clarification is required.

We believe implementation of this modification should be linked to incorporation of SCOGES into the SPAA to ensure that transfer is seamless.

I hope these comments are helpful.

Regards

Beverley Grubb
Commercial Manager
Scotia Gas Networks