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Our Ref.
Your Ref.

6 June 2008

Dear Julian,

RE: Modification Proposal 0202: "Improvement to More Frequent Reading provisions to allow benefits of AMR"

Thank you for the opportunity to comment on this proposal. British Gas supports its implementation.

We understand that this proposal seeks a relatively simple change to the UNC to allow Small Supply Points (SSPs) to be recognised within the UNC as being monthly read. According to the existing terms within the UNC, this would then allow shippers to such SSP meter points to submit reads no more frequently than weekly. This contrasts with quarterly, which is currently the case for this category of meter point.

We recognise concerns that such a move could give rise to a 13 fold increase in the volume of data that the transporters' agent, xoserve, could be required to process and manage. However, it is our opinion that the take up of this option, at least initially, is likely to be limited, with a gradual ramp-up. This should provide sufficient opportunity for an efficient and co-ordinated response, potentially eventually leading to the acceptance of daily readings from what is currently recognised as the NDM category. This approach would seem to fit with the current status of AMR roll-out.

This proposal should provide greater insight into actual energy usage, thus further facilitating relevant objective A11.1(d) – the securing of effective competition between shippers.

It should also assist in providing network owners/operators with a more accurate view of the energy flowing across a network, further facilitating the coordinated, efficient and economic operation of the pipe-line system. This may also in turn lead to security of supply benefits.

Page 1

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Should you have any queries with regard to this response please do not hesitate to contact me.

Yours sincerely,

Chris Wright
Commercial Manager