

Mr John Bradley
Secretary, Modification Panel
Joint Office of Gas Transporters
51 Homer Road
Solihull
B91 3LT

5th November 2009

Dear John

RE: UNC Modification Proposal 0255 – “*Publication of Objection Rates for LSP Supply Points*”

British Gas welcomes this modification proposal, and although believes that some benefits have been overstated by the proposer, is supportive of its implementation.

The proposer believes that the creation of a quarterly report showing the percentage of objections which have not been withdrawn will “*provide ... transparency on how frequently ... the objections process is used*” and “*highlight any ... abuse of the process*”. We do not believe either of these things to be true and believe that the proposed report will only provide an insight in to how many objections a supplier has decided to withdraw, for whatever reason.

As objections may legitimately be withdrawn, for example following settlement of an outstanding balance during the [**objection resolution window**], any inferences drawn from this report alone will inevitably be incorrect. We believe however that when combined with a wider evidence base this report may sufficiently illustrate abuse of the objections process, and that its existence alone may act as a further deterrent to any party considering such a course of action.

If you have any queries relating to this representation, please do not hesitate to telephone me on (07789) 570501.

Yours sincerely

David Watson
Regulatory Manager, British Gas