

EMAIL REPRESENTATION

From: eddie proffitt
Subject: **Mod 275**
Date: 29 November 2009 10:52:05 GMT
To: enquiries@gasgovernance.co.uk

FAO Tim Davies

Tim

I have just realised that I have not formally written expressing my strong support for modification 0275.

I doubt if my views are not known on the topic as I have spoken at the following meetings in support of the change:

- Gas Customer Forum - 27 July
- Demand side working group - 14 July and 27 October
- Ofgem Large User Group - 14 October
- Review Group 0264 - 29 September and 13 November

I do not have any real evidence to support the need for the change, in conversation with members a number have expressed interest but without commitment. An equal number have said that if the change is made they will not use it as they would rather retain the spare capacity in case of future need.

However I believe this rule is outdated, was inherited from the monopolistic British Gas and needs to be changed. It reflects the prevailing attitude of the time that the Transporter knows the gas requirements of a consumer better than he does himself. It also reflects the distrust of this new group called shippers as few understood their role. The rule retains the dictatorial attitude that existed at the beginning of competition.

It should also be pointed out that the change to the capacity/commodity split has doubled the impact of this rule.

I believe if the change is of benefit to only a single DM site it should still be made.

Regards, Eddie