

Mr. Bob Fletcher
UNC Panel Secretary
Joint Office of Gas Transporters
1st Floor South
31 Homer Road
Solihull
West Midlands
B91 3LT

19 May 2011

Dear Bob,

RE: Modification proposal 0312: Introduction of two-thirds majority voting

Thank you for the opportunity to respond to this consultation. British Gas Trading (BGT) supports this proposal.

The introduction of the ability for Ofgem to instruct a gas transporter to raise a UNC proposal under an SCR process may also confer upon the raiser of such a proposal an expectation that they will themselves support its implementation. This may extend to an implicit expectation of support at the Panel discussion and voting stage.

This proposal has therefore been raised as a “check and balance” to ensure that Ofgem does not wield inappropriate influence in the UNC modification process by acting as both the effective progenitor and deciding body for UNC modification proposals. It effectively seeks to “raise the bar” for a Panel decision; in the normal course of events this would require the support of a single additional voting party to move from a simple majority to a two thirds majority.

When considering this proposal against the relevant objectives, we believe the most relevant is (d) – this being competition between shippers and suppliers. We believe that this would be enhanced by instilling greater confidence in code processes amongst industry players, leading to greater engagement and more appropriate outcomes.

Please contact me if you would like to discuss this response.

Yours sincerely,

Chris Wright
Commercial Manager