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Ecotricity Reference No.: 340  
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**The Renewable Energy Company (Ecotricity) Response to "minded to" consultation on Ofgem's Licensing Policy for Gas Traders and Consequential Acceptance of the related UNC Modification Proposal 338V .**

Dear Dora Ianora,

Ecotricity is an independent renewable energy supplier and generator with over 65,000 domestic and non-domestic power and gas customer accounts, including over 17,000 gas accounts. We welcome this opportunity to respond to Ofgem's minded to position on the role of gas traders.

***Question 1:*** *Do you agree with our "minded to" position to accept UNC338V and with our assessment of the modification proposal against the relevant objectives, as discussed in Annex 1?*

Yes, we agree with Ofgem's minded to position. We believe that the removal of the requirement for gas traders that are not involved in the physical delivery of gas to have a licence, is a sensible proposal. We also agree with Ofgem's assessment that the removal of this barrier to entry will further competition in the gas market in line with relevant objective D.

**Question 2:** Do you agree with the wording of the proposed changes to the Licensing Guidance, as described in Annex 2?

Yes, we agree with the proposed wording for the licensing guidance on the definition of a shipper, as necessarily involving the physical delivery of gas is appropriate. The statement that "Persons not involved in the physical conveyance of gas on the GB network system, but who trade gas as a commodity at the National Balancing Point (NBP)" would not be included and therefore not require a licence; makes this definition very clear.

**Question 3:** Do you have a preference on when the licensing change should come into effect: 1 October 2012 or 1 January 2013?

We believe that the 1<sup>st</sup> of January 2013 would be a better date. It is important to allow industry sufficient time to adjust to these changes.

We welcome the opportunity to respond and hope you take our comments on board. We also welcome any further contact in response to this letter. Please contact Emma Cook on 01453 769301 or [emma.cook@ecotricity.co.uk](mailto:emma.cook@ecotricity.co.uk).

Yours sincerely



pp. Emma Cook  
Head of Regulation, Compliance & Projects