

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

19th May 2011

Dear Bob

RE: UNC Modification 0362 – “Use of “notional Metre Readings” and “Agreed Opening Meter Readings” for Individual CSEP Reconciliation”

1. British Gas supports Modification 0362 and believes that its implementation will enable better reconciliation of Connected System Exit Points (CSEPs) and therefore improve the accuracy with which costs are allocated within the market.
2. We share the Proposer’s concern that a number of Logical Meter Numbers have never been reconciled and agree that this creates a risk that both commodity and energy charges have been, and could continue to be, misallocated between Shippers.
3. Furthermore, we agree that by enabling independent Gas Transporters to use a wider variety of meter readings to reconcile CSEPs this problem will be partially mitigated, thus improving the accuracy with which industry charges are allocated and therefore improving Shippers’ ability to compete with each other. For this reason we believe Modification 0362 facilitates Uniform Network Code (UNC) Relevant Objective (d) and should therefore be implemented.
4. If you have any questions regarding this response, please do not hesitate to telephone me.

Yours sincerely

David Watson
Regulatory Manager, British Gas

