

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

6<sup>th</sup> January 2012

Dear Bob

**RE: UNC Modification 0390 – *“Introduction of a Supply Point Offtake Rate Review and Monitoring Process”*.**

1. British Gas supports the implementation of Modification Proposal 0390 and believes that it will lead to the Network Owner having more accurate information available, and thus improve the efficiency of their investment decisions.
2. We understand the importance of the Supply Point Offtake Rate (SPOR) data item and recognise that information about the maximum amount of gas to be taken off the network at any one time has both safety and investment implications. We therefore welcome proposals which will improve the accuracy of this data item.
3. By enabling Shippers to use Network Owner data to identify where the data may be in need of updating, the industry can work together to secure these aims. To this end, we believe that the Proposal is proportionate in its effect and likely to lead to an improvement in the accuracy of SPORs. We also believe that it is fair to obligate Shippers to update SPORs when they both require increasing or decreasing, and welcome the fact that this Proposal corrects this apparent oversight in Code drafting.
4. It should be noted that, even when processes exist to manage to the SPOR, customers sometimes change usage behaviour without notification and this cannot be prevented. We agree with the Proposer however that the industry should however seek to mitigate the impacts which arise when this happens.
5. We also agree with the Proposer that an improvement in the accuracy of SPORs should result in more efficient allocation of capital and thus ultimately reduce costs for the end user. We consider this is likely to improve the

efficient and economic operation of the pipe-line system. Our assessment of how these Proposals meet or do not meet the Relevant Objectives of Code are set out below.

***(a): the coordinated, efficient and economic operation of the pipe-line system to which this licence relates;***

6. Better quality information will enable the Network Owners to make more informed investment decisions, and thus manage the network in a more efficient and economical way.
7. If you have any queries relating to this representation, please do not hesitate to telephone me on (07789) 570501.

Yours sincerely

David Watson  
Head of Market Design & New Markets, British Gas