

**Representation - Draft Modification Report 0516S**  
**Information provision by large**  
**Customers to aid understanding of site characteristics**

**Responses invited by: 24 April 2015**

<b>Representative:</b>	Andrew Margan
<b>Organisation:</b>	British Gas Trading Ltd
<b>Date of Representation:</b>	24/04/2015
<b>Support or oppose implementation?</b>	Comments
<b>Relevant Objective:</b>	a) None b) None

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

This modification proposes to create a clear process for large gas customers to provide information (if they wish) to the gas transporters for use in emergency planning and constraint management. The expectation is that during the gas deficit emergency Transporters will consider this information and not straight away turn certain customers off, although there is no obligation on the Transporters to use this information. The suggested benefit of the proposal is that it will help ensure large customers keep emergency contact details up to date and it will enable customers to have a dialog with the Transporter.

We do not believe this modification will necessarily deliver the benefits it intends. Keeping emergency contact details up to date, is already a UNC obligation. A UNC mod is not required for consumers and Transporters to engage. The Transporters have indicated during an emergency it is unlikely they will use this information, as network safety and security of supply for domestic customers is their legislative priorities.

As a result we can't identify a benefit of implementing the proposal and we don't understand what it will achieve. Therefore we are unable to support it. As the proposal is essentially asking Transporters to keep a spreadsheet updated once a year, we do not believe the proposal is damaging to the industry either.

One concern is that the administration cost of managing and maintaining the process will filter through to consumers, which we would prefer is avoided. We are also concerned that some consumers may believe this process offers them some kind of insurance insurance against a gas deficit or emergency event and not invest in subsequent back-up supply, although we note the proposer has tried to address these concerns.

**Self-Governance Statement:** *Please provide your views on the self-governance statement.*

We agree with Self-governance

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

No lead time has been identified

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

None identified

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

No issues identified

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

None identified

**Please provide below any additional analysis or information to support your representation**

None available