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Modification Panel Secretary
Joint Office of Gas Transporters
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10 December 2010

Dear Bob,

Modification Proposal 0296 : Facilitating a Supply Point Enquiry Service for Non Domestic Supply Points.

Thank you for the opportunity to comment on the above Modification Proposal. Scotland Gas Networks & Southern Gas Networks would like to offer support for this Modification Proposal and would further provide the following comments.

UNC Modification Proposal 0296 proposes to amend and clarify the existing rules which govern the submission of a Supply Point Enquiry by a Shipper for a Supply Point where a User is contemplating the submission of a Supply Point Nomination. In addition, the Modification Proposal looks to provide an additional route to the information provided via a Supply Point Enquiry for non domestic Supply Points only and would enable the information delivery mechanism to be via, as the Modification Proposal suggests, an on-line portal.

UNC Modification Proposal 0296 follows on from a previous UNC Modification Proposal (0253) which attempted to facilitate improved access to Supply Point data in order to improve the speed and efficiency of Supply Point offers to end user consumers by gas suppliers. Detailed within Ofgem's decision letter, which rejected the implementation of Modification Proposal 0253, were cited concerns relating to the provision of cost and benefit information and also that implementation of the MOD may have resulted in information may be provided to suppliers without the express permission of the end user. Transporters had also provided written representations expressing concern around the potential provision of data relating to domestic Supply Points, again without the express permission of the end user concerned, which may have placed Transporters in breach of the Data Protection Act (1998). SGN consider all three of these issues have been addressed by proposer within Modification Proposal 0296:

(a). the Modification Proposal is not a User Pays Proposal and does not have any direct cost associated with its implementation. It would simply enable the provision of data via a different mechanism to that currently in place and any future costs associated with the provision of the data would be a matter for Shippers, either on a bilateral contractual basis

with xoserve or via a non-code service, which is currently governed under the User Pays User Group / Committee.

(b). the Modification Proposal strengthens the current arrangements which require Shippers to retain evidence of the provision of an end user's consent to submit a Small Supply Point Enquiry by extending this to also cover Large Supply Point Enquiries. MOD 0296 also provides for this consent to be provided verbally as well as in writing by the end user whilst retaining the requirement to provide such evidence to the Transporters (or Ofgem) on request.

(c). as any future implementation of Modification Proposal 0296 would not facilitate the bulk provision of Large Supply Point data (which may include domestic Supply Point data) to Shippers without the express consent of the end user, SGN consider that previous concerns relating to UNC Modification 0253 and the potential breach of the Data Protection Act (1998) have been removed.

SGN have the following comments to make in relation to specific sections of the Draft Modification Report:

3. Extend to which the implementation of the proposed modification would better facilitate the relevant objectives.

Standard Special Condition A11.1 (d): so far as is consistent with sub paragraphs (a) to (c) the securing of effective competition:

(i) between relevant shippers.

(ii) between relevant suppliers.

SGN consider the implementation of this Modification Proposal may enable the delivery of information required by Shippers to ascertain the costs associated with registration at a Supply Point in a timelier manner. Implementation may also provide Suppliers with the information required to provide end users with a quotation for a gas supply in a more efficient manner thus improving competition in this area. Therefore SGN consider the Modification proposal would better facilitate Standard Special Condition A11.1 (d) (i) & (ii).

We hope you find these comments useful.

Yours Sincerely,

Joel martin