

Mr Clive Whitehand
GL Noble Denton
Holywell Park
Ashby Road
Loughborough
Leicestershire LE11 3GR

12th June 2013

ICoSS consultation response.

The Industrial and Commercial Shippers and Suppliers (ICoSS) group represents all the major non-domestic industrial and commercial (I&C) suppliers in the GB energy market, supplying 70% of the gas needs of the non-domestic sector; a number of our members also supply electricity to their customers.

Please find accompanying this letter a detailed report written by Phidex consulting analyzing the AUGS statement 3, including underlying data, published for consultation on 1 May 2013.

ICoSS has always been supportive of the AUGS process and we are glad that many of the issues we highlighted in earlier consultations have been examined and addressed. As indicated in the attached report there are still some outstanding issues of potentially significant magnitude that will have a large impact on the estimate of total Unidentified Gas.

In addition we have highlighted previously the impact of several modifications, specifically UNC modifications 0410/0410A, 0425 and 0429 which will impact the Unidentified Gas estimate. All of these modifications will be decided upon by Ofgem prior to the commencement of the next AUGS statement. We expect that the impact of all of these modifications, if approved, be taken into account when determining the total volume of Unidentified Gas in the market for the year 2014/15. In the same vein, the impact of the changes to the Gas Theft licence needs to be taken incorporated as these new obligations will have a significant increase in the number of detected gas theft sites and so increase the amount of temporary Gas Theft assigned to the LSP NDM sector.

Please note that this data response is on behalf of each member who has actively participated in its development namely:

- Corona Energy,
- ENI,
- Gazprom Energy,
- GDF Suez Energy UK,
- Statoil UK,
- Total Gas & Power,
- Wingas UK.

It should therefore be treated as though each individual member has submitted an individual response and not as single response from one industry party.

Yours sincerely

A handwritten signature in grey ink, appearing to read "G. Evans".

Gareth Evans
Chair ICoSS