

Mr. Bob Fletcher  
UNC Panel Secretary  
Joint Office of Gas Transporters  
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West Midlands  
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17 September 2010

Dear Bob,

**RE: Modification proposal 0281: Introduction of an Implementation Timeframe for Modification Proposals**

Thank you for the opportunity to respond to this consultation. British Gas Trading (BGT) offers the following comments.

Modification proposal 0281 started out as a proposal to address a concern that some parties had in respect of code modification proposals “timing out”. However, that concern was far more relevant to other industry codes, particularly the major electricity codes, and had never caused difficulties in respect of UNC modification proposals. Indeed, given the more flexible treatment of implementation dates under the current UNC, it is not possible for a UNC proposal to unintentionally “time out”.

This became apparent during the development of 0281, and as a result the final version of 281, which is now presented for consultation, is significantly different from its original form. Ironically, however, our understanding is that the modification which originally set out to prevent “timing out” has now proposed a framework which for the first time introduces the ability for a UNC proposal to “time out”.

In summary, modification proposal 0281 seeks to provide a framework for proposers of UNC modification proposals to set out milestone dates for the implementation of their proposal, and the reasons why. While BGT believes that this may help to drive good discipline in code modifications, the current regime also allows proposers to set out a timetable should they so wish. Therefore, 281 does not provide a new opportunity in this respect, but may prompt greater thinking around implementation dates at the time of proposing a code modification.

Potential users of this framework, however, will need to be aware that should they choose to specify firm dates within their proposal, any delay to the progress of their proposal through the governance process following conclusion of the final modification report – delays which at that stage will be outside of their control – could result in their proposal being timed out against their wishes. This is a detriment

that does not currently exist, and we believe could deter use of the framework that 0281 offers. For these reasons we cannot consider this proposal to better facilitate the promotion of efficiency in the implementation and administration of the UNC.

Please contact me if you would like to discuss this response.

Yours sincerely,

Chris Wright  
**Commercial Manager**