

Mr. Julian Majdanski
Joint Office of Gas Transporters
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27 January 2006

Dear Julian,

Modification Proposal 0053 - "Extending established Uniform Network Code governance arrangements to include the Network Code Operations Reporting Manual referenced in Section V9.4"

Total Gas & Power Limited supports the above modification proposal.

Comments on the Draft Modification Report are as follows:-

- We believe the Draft Modification Report clearly sets out the advantages that implementing this proposal will bring. As such the proposal clearly facilitates the Relevant Objectives specified within the Gas Transporters Licence by improving transparency and accountability. Further it is consistent with Ofgem's principles of good governance set out in their June 2003 consultation document "Gas Retail Governance – Further Consultation".
- We agree that there are no operational or systems impacts as a result of the implementation of the modification. Similarly there should be no cost implications other than to provide the relevant facility to publish and version control the manual on a publicly accessible industry website. This is a concept that the Joint Office have already informally taken forward
- We support the statement that implementation could help reduce administrative costs and contractual risk for users by providing a clear and transparent mechanism to help ensure that the Operations Reports are relevant to User needs, Users being the prime beneficiaries of the Reports.
- We do not believe that the disadvantage highlighted in the report, such that responsibility for the administration of change being given to the Uniform Network Code (UNC) Committee rather than Ofgem, warrants concern with respect to the Operations Reporting Manual. The arrangements proposed by the Modification, such that the UNC Committee has open to it the option to refer any proposed change to a relevant sub-committee, should provide a route to ensure full transparency and discussion by the industry should any proposed change be unclear or contentious.
- We would support the suggestion made by the Governance Workstream that, when drawing up the legal text, consideration be given to the creation of a new section within the UNC which would list all the documents that are administered via similar arrangements to those put forward within the proposal. This would add clarity to the UNC and would promote efficiency in the administration of the Code.

Yours sincerely,

(This message is sent electronically and is therefore not signed)

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