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Our Ref.  
Your Ref.

15 January 2008

Dear Julian,

RE: Modification Proposal 0183: "Provision of Data in respect of downstream networks by the iGT directly connected to the Distribution Network"

Thank you for the opportunity to comment on this proposal. British Gas Trading offers qualified support.

British Gas Trading supports the general principle underpinning this proposal, that being the provision of relevant information to the DN of all downstream connected networks. We are concerned, however, that the proposer has taken a narrow view about how this might be achieved.

In order to comply with the UNC post implementation of this modification, the lead iGT will be required to ensure that it has contracted with, or otherwise secured agreement from, all downstream iGTs to provide the requisite data. We do not believe that this is necessarily a straightforward matter, given that under this proposal downstream iGTs are not bound by the provisions of the UNC, and in many cases will already be operating under existing terms and conditions which will need amending. Failure by a nested iGT to agree to pass on the required data at the required time will lead to the lead iGT being in breach of the UNC for reasons beyond its control.

We believe it might be more appropriate to pursue the same outcome by exploring the possibility of raising a parallel modification through the iGT UNC, thereby placing common obligations on all iGTs.

The proposer has also suggested that it would be less desirable for nested iGTs to submit data directly to the DNO, for a number of reasons. These include:

1. *The requirement for a contractual agreement between the two parties in the absence of any physical connection.* British Gas does not believe that this is necessarily a reason not to pursue this option, since a physical connection is not necessarily a pre-requisite for a contractual agreement.
2. *The potential removal of the lead iGT from the information flow.* If the lead iGT currently receives this information, we do not see why a requirement for a nested iGT to submit data directly to a DN should necessarily remove the lead iGT from the data flow.
3. *The DN would be unable to validate any data received.* We do not understand why a DN would be required to validate any nested iGT data against parameters established between the lead iGT and a nested iGT. Any requirement for a DN to do this would tend to suggest that the physical connection between the DN and a nested iGT is sufficiently relevant as to facilitate a contract between the DN and the nested iGT for the provision of that data (see 1 above).

Against this background, we believe that there could be more appropriate ways of managing this problem other than placing a UNC obligation on the lead iGT, and can therefore only give this our qualified support. If this concept of data provision was implemented appropriately, we believe that the efficient and economic operation of the pipeline system would be enhanced.

Should you have any queries with regard to this response please do not hesitate to contact me.

Yours sincerely,

Chris Wright  
Commercial Manager