

16 July 2009

Mr Tim Davies
Chief Executive
Joint Office of Gas Transporters

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Dear Tim

UNC Modification 253 - Facilitating a Supply Point Enquiry Service for Large Supply Points.

I am writing on behalf of the Major Energy Users' Council (MEUC), to comment on the above modification. The MEUC is an independent body representing the interests of a large number of industrial, commercial, retail and public sector organizations for which the use of electricity and gas is a significant factor in their operations.

Its principal objectives are to keep members informed of developments, to advise them on energy matters (regulatory, purchasing, energy efficiency) and where appropriate respond on their behalf to government and regulatory bodies.

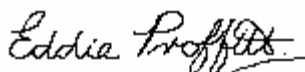
May I from the start make it absolutely clear that MEUC are totally opposed to this modification.

At the heart of this proposal is, who owns the data held by Xoserve? MEUC have always believed that the consumer owns the data that is held on the system and it is for the consumer to authorise release of this data to suppliers' of their choosing. In fact some time ago a development group investigated whether a means could be found whereby the consumer could be involved in authorising an enquiry or nomination and the correction of erroneous data, however at the time it was thought too difficult to resolve.

The draft modification report sums up the issue well, "The Modification Proposal has the potential to allow the targeting of customer groups without the receipt of an enquiry from a customer". We should not be facilitating suppliers to embark on "fishing trips" to target customers or worse, from rejecting an enquiry without giving it the correct consideration.

We do not want to see an introduction of the worst marketing techniques that some supply companies may employ in other parts of their businesses. It is surely not too much effort for suppliers to respond to tenders for the limited number of supply points that this modification would cover.

Yours truly,



Eddie Proffitt
Gas Group Chairman



Major Energy Users' Council
THE UTILITY CONSUMER NETWORK & LOBBY