



St Lawrence House  
Station Approach  
Horley  
Surrey  
RH6 9HJ

Modification Panel Secretary  
Joint Office of Gas Transporters  
First Floor South  
31 Homer Road  
Solihull  
West Midlands  
B91 3LT

05 August 2009

Dear John

**Re: Modification Proposal 0253: Facilitating a Supply Point Enquiry Service for Large Supply Points**

Thank you for providing SGN with the opportunity to comment on the above Modification Proposal. SGN provide the following comments.

Currently the UNC only allows for Supply Point Enquiry to be made where the User is contemplating submitting a Supply Point Nomination. Implementation of this proposal aims to amend the UNC to allow for a report to be produced by Transporters to provide all data to Users. This information is currently made available to Users by submission of a Supply Point Enquiry but is limited to a specific number of Supply Points per enquiry per day. The proposer states this data would then be readily available for Users, therefore, quotations can be provided more rapidly to potential customers.

Although there will be consistency across all recipients of any Supply Point Enquiry Service we consider this proposal may benefit larger Shipper organisations over smaller Shippers, as the larger Shippers may have the resources to pursue customers which could be considered detrimental to competition.

Furthermore, we also believe there to be concerns regarding data protection with regards to provision of supply point enquiry data and consider that these have not been a) fully identified and b) satisfied by the Proposer. SGN had hoped following the Distribution Workstream on Monday 06 July written confirmation would have been provided to confirm that the ICO had no concerns with the Transporters providing this information, unfortunately this has not been made available.

SGN has the following comments to make in respect of specific sections of the Draft Modification Report:

**3 Extent to which implementation of the proposed modification would better facilitate the relevant objectives**



**Standard Special Condition A11.1 (d): so far as is consistent with subparagraphs (a) to (c) the securing of effective competition:**

SGN believe implementation of this proposal does not further this relevant objective as we consider the proposal benefits larger shipper organisations over smaller Shippers, as the larger Shippers can use available resources to target customers which could be considered detrimental to competition.

We hope you find these comments helpful.

Yours sincerely

Bali Dohel  
Commercial Analyst  
Scotia Gas Networks

Direct Tel: 01689 886780  
Mobile: 0787 9434 113  
Email: Bali.Dohel@scotiagasnetworks.co.uk