

Shell Gas Direct Ltd

Bob Fletcher Joint Office of Gas Transporters 31 Homer Road Solihull B91 3QJ Gas & Power
1-3 Strand
London
WC2N 5EJ
United Kingdom
Tel +44 (0)20 7257 5874
Fax +44 (0)20 7257 0101

Email: jemma.woolston@shell.com Internet http://www.shell.com/gasdirect

07 January 2011

Dear Bob

## Modification 0345 – Removal of Daily Metered Voluntary Regime

Thank you for the opportunity to comment on the above proposal. The following brief comments are offered on behalf of Shell Gas Direct (SGD) Ltd. This response is not confidential and so may be placed on your website.

For the avoidance of doubt, SGD **does not support** the implementation of Modification Proposal 0345.

We are supportive of increasing competition in Daily Meter Read provision services. However, we do not feel that the newly implemented DME regime has been given the opportunity to prove itself a viable alternative to the regulated DMV service and therefore think the timescales proposed in the Modification are not workable.

In particular, we note the DME regime was intended as an optional service when it was implemented as recently as November 2010. We consider that customers would find it unhelpful for there to be a change to the optional nature of this service so soon after this date.

Please do not hesitate to contact me should you wish to discuss these comments.

Yours sincerely

Jemma Woolston
Industry Operations Analyst, Shell Gas Direct

Please note as this letter has been delivered electronically this letter is unsigned