

Mark Baldock
Head of Metering
OFGEM,
9 Millbank,
London,
SW1P 3GE

3rd February 2003

Dear Mark,

Re: The provision of metering information by Transco

British Gas welcomes the opportunity to comment on Ofgem's consultation requesting views on Transco's levels of performance in supplying information to enable metering services.

Overall, we have not experienced any significant difficulties in the provision of data from Transco. We have received a good level of support and co-operation from Transco in both developing metering competition and in clarifying interface processes and procedures. Moreover, the meter operators we use have not openly made comment with regards to poor levels of service from Transco. We therefore do not have any specific examples of failure to provide metering data in a timely manner as requested by Ofgem.

Nevertheless we can make comment with regards to the other delays that can be experienced where independent meter operators (principally in the I & C market), having an interdependency on Transco to provide services as part of the overall metering installation, are unable to offer improved Standards of Service due to the Transco elements.

One area of dissatisfaction we can comment on specifically is with the Service Level Agreements that Transco have put in place within the "Service Appraisal Scheme". This places obligations upon meter operators to confirm service pipe pressures with Transco when a number of scenarios occur. We are particularly concerned with the speed that Transco have committed to turning this information around and believe that the current arrangements are unacceptable. We would appreciate any help or pressure from Ofgem in pushing this issue forward with Transco and finding an acceptable solution.

As demonstrated in Ofgem's request there are a number of vehicles to ensure Transco's compliance with metering competition obligations and levels of service. We do not believe that these need extending or refining as they should already provide a sufficient framework to incentivise positive behaviour from Transco and if necessary allow Ofgem to enforce behaviour.

British Gas believe that the only way to ensure that metering competition is a success, and that the benefits are realised by all parties, is to ensure that Transco's Gas Transporter business and Metering Operator business are completely separated. Furthermore, that provision of services from Transco's Gas Transporter business is on a non-discriminatory basis to all Metering Operators and that an even playing field is established in order to encourage new entrants into this market and further drive efficiencies.

Please do not hesitate to contact me on 020 8737 9373 regarding any of the points raised in this response.

Regards

Tony Morrison

Regulatory Affairs
British Gas

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