



Ian Anthony
Infrastructure Manager
Ofgem
9 Millbank
London SW1P 3GE

Direct lines:
Tel: 020 7257 0132
Fax: 020 7257 0101

22 March 2005

Dear Ian,

Gas Suppliers' Licence Standard Licence Condition 21 – Publication of Information to Customers

I refer to your letter of 1 March 2005 outlining Ofgem's proposals to issue a direction relieving suppliers from certain obligations under SLC 21.

Shell Gas Direct (SGD) supports Ofgem's approach. As a supplier to business customers across Britain, we consider that the current licence requirements would create unnecessary additional costs, likely to be passed to our customers, without any commensurate benefit. This also applies to the second option outlined in your letter. The direction would provide the most effective way forward while retaining the ability for the customer to be able to obtain the required information.

Ofgem seeks views on the timing of the direction and the wording of the draft direction. We have no comments on the text but do have concerns about the proposed effective date of 1 June 2005. We consider that 1 May 2005 would better resolve the issues with the current arrangements and the DN Sale. While the sale to third parties is scheduled to take place on 1 June 2005, National Grid Transco is expecting shippers to sign new framework agreements for the distribution networks (DNs) it is disposing of in late April, taking effect from 1 May 2005. It is at this date that shippers will be supplying gas on different networks under separate short form network codes. As all will be owned by NGT at this time, we expect the address to remain the same but the actual *name* of the gas transporter on which gas is being supplied will differ between DNs. It would therefore appear appropriate for the direction to take effect from 1 May 2005.

Yours sincerely

Tanya Morrison
Regulatory Affairs Manager