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Your Ref: Ofgem doc 279/07

Dear Chris

Open letter on Ofgem's proposals to implement revised standards of performance arrangements for gas transporters

energywatch welcomes the opportunity to respond to the issues raised in the open letter. Our response is non-confidential and can be published on the Ofgem website.

We fully support Ofgem's proposed approach to the revision of the standards of performance for gas transporters. These changes are in line with the final proposals for the gas distribution price control issued by Ofgem in early December. In particular, we agree that the supply restoration standard should be extended to cover smaller non-domestic consumers and that it should encompass third party damage and water ingress. It is vital for consumers to know that there is clarity about the allocation of responsibility between transporters for compensation payments when a standard is not met, and that compensation will be provided on a timely basis.

Regarding the proposed changes to the regulation for provision of alternative heating and cooking facilities to priority consumers, it must be clear in the transporter's communication to the consumer of the offer that these facilities are available and that it is the consumer's choice whether to take them up. In the same way, it must be clearly explained to consumers that they have the right to make a claim for compensation and that the claim must be made within three months. The form of the communication must suit the needs of the particular priority consumer.

We note the timetable for taking the amendments forward for implementation on 1 April 2008. We will continue to keep these issues under review, always considering the possible impact on consumers.

If you wish to discuss our response further please do not hesitate to contact me on 0191 2212072.

Yours sincerely

Carole Pitkeathley
Head of Regulatory Affairs