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Dear Chris,

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

This response is made on behalf of National Grid Gas Transmission which owns and operates the bulk gas transmission system in Great Britain.

We would refer you to our previous response to your updated proposals document (226/07) sent on 22nd October 2007.

Whilst in general we support Ofgem's proposals we remain concerned that the proposed amendments to the GSOP Regulations to remove the exemption for third party and water ingress interruptions mean that National Grid Gas Transmission could be impacted by the terms of the supply restoration standard (Regulation 7). We recognise that the exemption to incidents where more than 30,000 customers are affected makes this unlikely, however we consider that such a fundamental change in policy deserves due consideration and we therefore suggest that these changes should be consulted on outwith the GDPCR process. Our continued view is that we do not agree with these proposals, but we would be happy to work with Ofgem to consider the issues in more depth and find a solution.

Should you wish to discuss any of the issues raised in our response, please do not hesitate to contact me or Alex Thomason on 01926 656379.

Yours sincerely,

Chris Bennett
Regulatory Frameworks Manager