

Inveralmond House  
200 Dunkeld Road  
Perth PH1 3AQ

Ayesha Uvais  
Gas Distribution  
Ofgem  
9 Millbank  
London  
SW1P 3GE

Tel: 01738 456571  
Fax: 01738 456415

18<sup>th</sup> January 2008

Dear Ayesha

**Gas Distribution Price Control Review (GDPCR): Second Licence Drafting Consultation Document**

I am writing in response to Ofgem's consultation document dated 11<sup>th</sup> December 2007, inviting views on the Gas Distribution Price Control Review updated licence drafting consultation document and in particular Appendix 13. We welcome the opportunity to provide further comment in relation to iGT licensees following our initial response made in our email to Indra Thillainathan on 23rd November 2007.

We would like to note the change to Standard Condition 17.5 (d) under the Provision of information. The addition of '*whose premises are connected to the licensee's pipe-line system*' in relation to domestic customers who require assistance or advice and whose first language is not English is an amendment we welcome.

However, with reference to our initial email response we would like to reiterate some of the issues that are still of concern to us and that we believe Ofgem should re-consider. In Standard Condition 17.3 under Services for vulnerable domestic customers we believe 'on request' should be reinstated into where it says '*the licensee must provide facilities, free of charge*', as to omit this adds additional burdens on licensees and, furthermore, would make it inconsistent with the Electricity Distribution Licence.

In relation to the Availability of Resources report, we continue to believe that the proposal which requires iGTs to provide a cash flow statement as unnecessary. The Availability of Resources report and the Working Capital Statement within that are signed off by our Directors and reviewed by our Auditors, and therefore we firmly believe that this is sufficient to provide the necessary assurance to Ofgem.

If you have any questions regarding any of the above please do not hesitate to contact me.

Yours sincerely

**Malcolm Burns**  
**Regulation Manager**