

Stuart Cook
Director, Transmission
Ofgem
9 Millbank
London
SW1P 3GE

4 September 2009

Dear Stuart,

RE – Gas enduring offtake regime: Licence modification consultation on aggregating baselines at Didcot, Stallingborough and Staythorpe

British Gas Trading Limited supports aggregation of the baselines as set out in the consultation letter.

In our response to Ofgem's earlier informal consultation on this subject we expressed dissatisfaction about the fact that DN baseline changes were made before the close of the July application window for enduring NTS exit (flat) capacity whereas the changes currently being proposed follow in the wake of that window. We continue to be concerned about this form of bit-wise change which has, in our opinion, given rise to more favourable treatment of one class of exit point over another.

The consultation refers to UNC modification proposal UNC263 that we raised to enable the partial assignment of exit capacity and that would, if implemented, offer system users greater flexibility in the management of their registered exit capacity, including the potential issue identified in the consultation letter. This proposal has recently been referred to the Transmission Workstream for development following some issues raised at a late stage by National Grid. Some of these issues already exist, in our opinion, with the current arrangements for assigning full exit capacity. It is to be hoped that a workable and, critically, an affordable solution will be found that addresses the issues raised.

Please contact me if you would like to discuss this response.

Yours sincerely,

Graham Jack
Commercial Manager