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Ljuban Milicevic
Regulatory & Energy Economist
Ofgem
Ljuban.milicevic@ofgem.gov.uk

31st January 2011

Dear Ljuban,

Re: Classification of premises for the purposes of the standard conditions of the gas supply licence.

Please find attached Gazprom Marketing & Trading Retail's (Gazprom) response to your proposals in relation to the definition of "Domestic Customer" and/or "Domestic Premises". Thank you for the opportunity to comment on Ofgem's proposals and we are happy for our comments to be shared with other interested parties.

We note that Ofgem believe that in certain circumstances the a supply of gas to a legal entity acting on behalf of individual residents is a supply to Domestic Premises and to a Domestic Customer and thus the Supply of Gas can only be undertaken by a Domestic Supplier and that such Supply should be subject to a bespoke contract appropriate for such arrangements.

To support this we believe the scenario of a Wholly "Domestic" Multi Site Contract would need to be developed as it does not currently fall within the current definition of a Multi Site Contract as set out in Condition 6.5.

We would welcome the opportunity to take this matter forward and believe the proposal would benefit from development in a suitable industry workshop. Should you have any queries on our response or wish to discuss any aspect of our response please don't hesitate to contact me.

Yours Sincerely

Steve Mulinganie
Regulation & Compliance Manager