

Draft MAMCoP comments from Keith Johnston

My comments relate to Annex 7, clause 3.2 where the appeals process for the MAM is undertaken by members of the MAMCoP board who "are independent of the MAM process or commercial activities."

As OFGEM formally suspend the MAM, the appeal should therefore be to OFGEM direct as the arbiter in the process.

The MAMCoP board does not have the authority to determine the business of a MAM. A sub group of MAMCoP should therefore not have the authority to review OFGEM suspensions. Furthermore, the MAMCoP group is also made up of varied interest groups, some of which do not operate as a MAM. Those that do not operate as a MAM should therefore not make decisions about the fate of a MAM. Other MAMs are in competition to the suspended MAM and for commercial reasons should not be allowed to participate in any appeals process as they may do so for commercial gain.

Recommend that appeals be direct to OFGEM.

Keith Johnston

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