

Adhir,

I am sorry we have not had the resource to respond to this particular consultation. However, I think we have made our views on these issues clear in other communications.

With regards to the retail market we don't think it is appropriate for Ofgem to be trying to guess what detailed propositions are going to be offered. In any event they do not need significant regulatory action right now to stimulate activity.

The main issue is in the wholesale market where reform is passed being an urgent requirement for gas. Indeed even if the programme timetable for project Nexus is to be believed it is already likely to be way too late.

We do not agree with proposition 6 at all. We see no reason why customers should not be subject to a reasonable termination notice period in the same way as they are for other continuous services (cable TV, telephones etc). This could potentially place suppliers with an impossible task of balancing their wholesale position in a short timeframe and certainly would be open to massive abuse unless Ofgem first addresses the issue of miss-selling in a more complete and robust manner.

For proposition 7 It is wrong to assume that centrally procured services would necessarily be cheaper or more effective. They would almost certainly stifle innovation that might bring efficiency gains for the supplier or benefits to the customer.

We entirely agree that some code consolidation would be a good thing. This should extend to consolidating some of the industry bodies that have been created since deregulation.

Regards,



Managing Director, Utilita