

Comments below relate to Draft Modification Report 0658 "Interruption Transfer Service".

- EIUG is sceptical of the premise on which the case for introducing this modification is based, namely that there is now an increased risk to security of winter gas supplies that requires major changes to the current interruptible regime.
- EIUG cannot accept that shippers should be given the ability to vary the chance of their customers being interrupted without those customers being directly involved in the decision, e.g. by having a right of veto, or to access to some mutually agreed mechanism for compensation.
- EIUG believes that even if both of the above objections were addressed, it would still be wholly improper to institute such changes during an existing contract period. This would amount to changing the terms of consumers' contracts without their consent. If a new regime is to be imposed, it should be done in advance of contract negotiations so that all parties can make an informed judgment about their options.