

Elizabeth Gannon
Competition Policy Manager
Ofcom
Riverside House
2a Southwark Bridge Road
London
SE1 9HA

Paul Rogers
Regulatory Frameworks
Manager

paul.s.rogers@nationalgrid.com
Direct tel +44 (0)1926 655584
Direct fax +44 (0)1926 656520

www.nationalgrid.com

27th June 2012

Dear Elizabeth,

Re: Simplifying Non Geographic Numbers Consultation: Detailed proposals on the unbundled tariff and Freephone

National Grid Gas plc (Distribution) (NGGD) welcomes the opportunity to comment on this consultation. Please find below our observations against the main principles, rather than each specific question. These build upon our response to Ofcom's original Consultation on Simplifying Non Geographic Numbers published on 16th December 2010.

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system throughout Great Britain and through its gas distribution business transports gas in the heart of England to approximately 11 million customers. In addition, National Grid owns and operates substantial electricity and gas assets in the United States. National Grid owns and operates the National Gas Emergency Helpline 0800 111 999 on behalf of all UK Gas Transporters. The helpline receives 1.9 million calls per annum from the public in relation to gas escapes and carbon monoxide emissions, of which we estimate around 28% are from mobile phones.

All Gas Transporters are licensed by the Gas and Electricity Markets Authority under section 7 of the Gas Act. Under the terms of the Gas Transporter's Licence, Conditions A8 Emergency Services and Enquiry Service Obligations and D10 Quality of Service Standards, all licencees are required to establish, operate and maintain a single continuously manned telephone service in order to receive calls on any matter or incident that may cause danger or requires urgent attention in relation to gas conveyed through pipes, or involves escapes of gas, or emissions of carbon monoxide from gas appliances. The provision of the National Gas Emergency Helpline, fulfils this duty under the Gas Transporter Licence.

The Helpline service is designated by the licence as without charge at the point of use in order to encourage calls by members of the public to minimise risk to life and property and was established prior to the widespread use of mobile phones. National Grid recognises that in some cases, members of the public could be discouraged from making a call to the

helpline if they believe they will be charged. For example, customers who have pay-as-you-go mobile phones with zero credit cannot dial the freephone number under the current regime. Zero rating of these calls would ensure anybody can call the Gas Emergency Helpline without being charged.

We support Ofcom's comments made in Part A paragraphs 4.42 and Part C, Appendix 20, in that National Grid has attempted to contact mobile operators requesting that they zero rate calls to the helpline with limited success, so the proposals made in this consultation are welcomed by National Grid. We believe the Ofcom proposals will reduce the risk of customers with mobile phones being dissuaded from reporting a gas escape or emission of carbon monoxide.

For the reasons outlined in this letter, and the points made in our previous response, National Grid remain of the view and supports Ofcom's proposals to zero rate 0800 calls from all telephones, fixed and mobile operators. We note that Ofcom will have consulted on all issues and made a final decision by the end of 2012, with an 18 month lead time to implement all the changes, into 2014. National Grid would like to request that this timeline be accelerated so that the Emergency Services line can be truly free at point of use to all callers as soon as possible.

Should you wish to discuss any of the points made in this letter, please contact myself or Ruth Thomas on 07768 173469 or at ruth.thomas@uk.ngrid.com .

Yours sincerely,

[by email]

Paul Rogers
Regulatory Frameworks Manager
National Grid, UK Distribution