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Dear Julian

## **Representation for Modification Proposals 0097 and 0097a “Publication of Aggregated ex-post information for pipeline interconnector offtake flows”**

Thank you for your invitation seeking representation with respect to the above Modification Proposals. As Proposer, National Grid NTS fully supports implementation of Modification Proposal 0097a and does not support the implementation of 0097 for the reasons detailed in the 0097a Proposal.

National Grid NTS recognises the importance of the disclosure of information to the market and have worked hard over the past few years to improve both the volume and standard of information available on our website. By publishing the interconnector offtake flow information on the National Grid’s website it will ensure that all interested parties will have equal access to the information at the same time and in the same location.

In addition National Grid NTS consider that the systems modification work required in order to amend both our website system and Gemini (as would be required by UNC 0097) would be an inefficient and unnecessary investment. The alternate Proposal, UNC 0097a, involving modifications to the website systems only therefore represents a more economic and efficient solution to achieve the same aim.

The wording of 0097 has potential to be interpreted in two ways. With regard to the publication of data on the NGG website it can be read to mean that just the interconnector flows are to be published or the entire Gemini Meter Energy List. The latter interpretation involves all the daily metered supply points totalling several hundred pages of data. This data is not referenced anywhere else in the proposal document. In producing the legal text, our lawyers have interpreted the intention of

the proposal to include publication of the interconnector data only. This interpretation and the legal text has been agreed with the Proposer.

The interpretation of the publication of data on the NGG website within Modification Proposal 97 has also been discussed at the Transmission Workstream on the 2<sup>nd</sup> November 2006 and it was confirmed by the Proposer that it is the intention of the Proposal to publish the interconnector flows only on the NGG website.

For information the systems costs associated with the implementation of the Proposals are currently estimated to be £100,000 for 0097a compared to £128,000 for 0097. These costs are based on the understanding of the Proposal detailed above i.e. that only interconnector data is to be published on the NGG website.

Yours sincerely

Chris Logue