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Dear Julian,

RE: Draft Modification Report 0100: "Amendment to OPN/SFN Submission Times"

Thank you for the opportunity to comment upon this modification proposal.

BGT recognises Ofgem's and NGG's desire to improve upon the current information provision regime. We also recognise the financial incentives on NGG which underpin any such change. However, we believe that there is a very real danger that in bringing forward the provision of information to the market, as set out in this proposal, the quality of that information is likely to be of significantly lower value to market participants than is currently the case.

BGT believes that where high quality data is unavailable for submission to NGG, an incentive will be created for Users to submit poor quality, or even meaningless, data, in order to achieve the UNC requirement. Parties would then make greater use of any renomination opportunity of in order to correct their positions later in the gas day.

The earlier notice period for DNOs also implies that larger DN connected loads will be disproportionately affected, since they will be required to submit information to the DNOs even earlier in the gas day.

In a number of cases, it is also likely that shippers would need to amend existing contracts with large customers in order obtain the necessary data earlier. This in itself is unlikely to be a cheap or simple task, not only due to any knock on effect to those customers' systems and processes, but also since customers are unlikely to recognise any benefits to themselves of such earlier provision. For these reasons, we do not agree with the proposer that implementation is at all possible prior to winter 2006. Indeed, we believe that 6-9 months is a more realistic timetable should a decision be made to implement this proposal.

In summary, we are unable to agree with the proposer's view that this modification would improve "the efficient and economic operation of the pipeline system" as set out at section A.11.1(a) of the Transporter licence. Indeed, we believe that the provision of less reliable data will lead the market to plan its actions for the coming day with less certainty, and build in margins in order to cover off this uncertainty. This modification would therefore have the opposite effect of increasing costs and creating a less efficient system. We therefore do not support this modification.

Please don't hesitate to contact me if you have any queries about this response.

Yours sincerely

Chris Wright
Contracts Manager