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Dear Julian

National Grid NTS Representation for Modification Proposal 0100 “Amendment to OPN/SFN Submission Times”

Thank you for your invitation seeking representation with respect to the above Modification Proposal. As Proposer, National Grid NTS continues to fully support implementation of Modification Proposal 0100 for the reasons previously detailed in the Proposal.

The Modification Proposal

With respect to comments received following the issue of the Modification Proposal National Grid NTS would like to clarify that the Proposal seeks to promote the provision of additional information to support the D-1 gas demand forecasting service. This in turn will enable National Grid NTS to respond to industry requests, and recently introduced licence incentive, to improve the accuracy of these early forecasts.

A number of parties have raised concerns that implementation of the Proposal will require them to amend their contracts and or processes in order to submit an earlier Offtake Profile Notice (OPN). Some have also indicated that processes outside of Great Britain could be impacted. We acknowledge these concerns but believe that these concerns should not delay the implementation of the Proposal. During any period required to put in place any necessary procedural or contractual changes the Proposal would require the OPNs provided to represent the best information available to the OPN provider at the time of submission. We acknowledge that in some cases the process changes will take time to implement and that improvements to the information will follow.

Parties that submit OPNs to National Grid NTS generally fall into one of four categories; these are power stations or major industrial loads, interconnectors, storage sites and distribution networks. In the majority of cases the party submitting the OPN is likely to be able to forecast their own gas demands more effectively and accurately than National Grid NTS.

As stated above, National Grid NTS acknowledges that not all parties will immediately be able to provide the most accurate data under the proposed timeframes, however we feel that some level of improvement over the current situation is likely to be achievable by some if not all parties immediately and that this will assist in better facilitating the relevant objectives detailed in the Proposal. We recognise the uncertainty inherent in any demand forecast but feel that a forecast built, in part, upon information provided by the parties proposing to offtake gas has more merit than one derived in isolation by the Transporter.

Yours sincerely

Chris Logue