

Representation For. 0108
"Publication of Near Real Time Data at GB Storage Sites"
Version 1.0

Date of Communication: 08/09/2006
External Contact: joy.chadwick@exxonmobil.com (Exxonmobil Gas Marketing Europe Limited)
Slant: For
Strictly Confidential: No

Abstract

Dear Julian,

Thank you for the opportunity to comment on the above Modification Proposal. ExxonMobil International Limited is responding behalf of its affiliate shipper, ExxonMobil Gas Marketing Europe Limited.

ExxonMobil supports this proposal and the decision by Ofgem to grant the proposal 'Urgent' status.

Centrica Storage Limited, in proposing Mod 0108, seeks to address what it considers to be a significant risk of exposure of individual company commercial positions brought about by the implementation of Mod 006. In our previous responses to Mods 0747 and 006 we have consistently supported transparency and the provision of information to the market, where the information is provided; on a timely basis, consistent with the balancing period; non-discriminatory, where no individual company commercial position is exposed to the market; and; promotes an efficient and effective competitive market.

We point once again to Chapter 1 of the Competition Act 1998 which prohibits agreements between undertakings that have the object or effect of preventing, restricting or distorting competition. Information sharing agreements are not, per se, anti-competitive. However, to the extent that sensitive information is shared, the effect that it may have means it needs to be carefully considered. In this respect, the OFT's Guidance Note 401 of March 1999 is worthy of note. It states:

"In general the exchange of information on output and sales should not affect competition provided that it is sufficiently historic and cannot influence future competitive market behaviour. There may however be an appreciable effect on competition if it is

possible to disaggregate the information and identify the participants. This may also be the case if the exchange relates to recent, current or future information" (paragraph 3.24).

ExxonMobil continues to be of the view that commercial information should be provided to the market in an aggregated form that does not allow disaggregation to expose individual parties to commercial risk.

We trust these views will be taken into account. If you have any questions relating to this response please do not hesitate to contact me.

Yours sincerely

Joy Chadwick