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RE Modification 0108

Publication of Near Real Time Data at GB Storage Sites

Dear Julian,

Thank you for the opportunity to comment on the proposed modification.

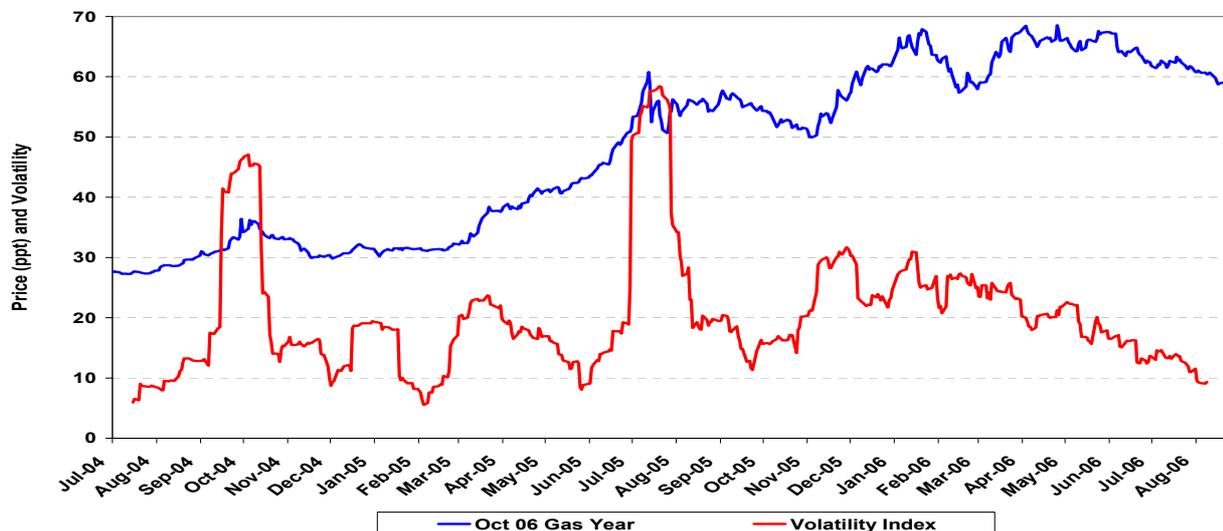
Firstly, JHA believes in open, competitive and transparent markets. We would like to register our opposition to this proposed modification. We believe it goes against the arguments accepted in 006, especially those concerning commercial confidentiality covered by the 10mcm rule. These arguments should have been discussed during the consultation process and not rushed through the urgent route.

Non Market Participants- cannot create volatility

Furthermore, we cannot accept that release of information to non market participants could by definition lead to volatility if that is indeed the true motive behind the proposal. Industrial and commercial buyers do not have shipper licences and do not trade gas. It therefore follows that no non market participant can take advantage of any distressed buyer.

Markets have been highly volatile

Without 006 the UK market has experienced a high degree of volatility well before the introduction of 006. It would be difficult to imagine a more turbulent time in the price history of the market.



Monopoly Role of Rough in the market for Flexible Gas

If the argument used by the Competition Commission *Centrica plc and Dynergy Onshore Processing UK Ltd: A Report on the Merger Situation 2003* is accepted there is a distinct storage market for flexible gas that comprises of short, medium and finally long term storage (see paras 1.6- 1.7 of the report) . As the UK's only long term storage site it maintains an effective monopoly position and should correspondingly be at least morally obliged to follow information release proposed in 006.

Yours Sincerely

Dr Sebastian Eyre
Director of Research
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