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Dear Julian,

**CODE MODIFICATION PROPOSAL No. 0108**  
"Publication of Near Real Time Data at GB Storage Sites"

Thank you for your invitation seeking representation with respect to the above Modification Proposal.

National Grid NTS is, on balance, neutral in relation to the implementation of this Modification Proposal.

National Grid NTS sympathises with CSL's view that the implementation of UNC 006 "Publication of Near Real Time Data at UK sub-terminals" could lead to the opportunity for discrimination against Storage Operators. We appreciate that this class of User is obligated to disclose other information that uniquely reveals their market position within the balancing period. We note however that, issues and concerns very similar to those raised by CSL in their Proposal were discussed extensively during the various consultations associated with the UNC 006 modification process and we consider that nothing has materially changed since Ofgem's decision to implement UNC 006.

National Grid NTS has been developing the systems functionality that supports the publication of Near Real Time Data from Sub Terminals in accordance with the UNC Modification Proposal 006, which is scheduled to be implemented on the 3rd October 2006. On the assumption that we receive at least seven days notice prior to implementation the configuration changes required to implement 0108 can be accommodated. That said, there is likely to be a web site presentational anomaly as a result of such changes since two graphs that are currently being developed with the intension of showing Short and Medium Range storage flows will be unpopulated if 0108 is implemented. It is likely that this situation would be resolved shortly after 006 implementation.

In conclusion we appreciate the arguments relating to the commercial exposure of Storage Operators but would like to point out that the implementation of this Proposal in the timescale proposed by the Proposer would require short notice IS system changes and would therefore generate associated risks on National Grid.

Please let me know if you, or the SME assigned to this Proposal, requires any further information to enable preparation of the Final Modification Report.

Yours sincerely

Chris Logue