nationalgrid

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

National Gas Emergency Service - 0800 111 999* (24hrs)
*calls will be recorded and may be monitored

Phil Lawton
Manager – Regulation
phil.lawton@uk.ngrid.com

Direct tel   +44 (0) 1926 656448
Direct fax   +44 (0) 1926 656620

www.nationalgrid.com

Mr. Julian Majdanski
Joint Office of Gas Transporters
Ground Floor R
Homer Road
Solihull
B91 3QJ

12 September 2006

Dear Julian,

<u>UNC Modification Proposal 0108:</u> 'Publication of Near Real Time Data at GB Storage Sites'

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

National Grid Gas plc (UK Distribution), ("Distribution") supports the implementation of Modification Proposal 0108.

We believe that the issue raised by the proposer does present commercial risks for the operators of the storage facilities. By publishing information at connection level it may be possible to deduce individual shipper behaviour that would be unavailable at other delivery facilities due to the composite nature of the information published about beach supplies. Consequently, storage users' delivery characteristics could be under disproportionate scrutiny compared with deliveries by users at non-storage entry points.

We agree with the proposition that a composite storage delivery figure would be a closer analogy to a sub-terminal and, consequently, the request to publish aggregate deliveries would appear to be a valid way forward. We believe that aggregate delivery information should be sufficient to spot deliveries which are counter to demand trends. In the event that these occur systematically any resulting investigation by the Authority could be based on disaggregated information.

We believe competition is best served by market participants being placed under equivalent levels of scrutiny, and for this reason, Distribution supports the implementation of Modification Proposal 0108.

Yours sincerely,

Phil Lawton.