

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

**Date of Communication:** 11/09/2006  
**External Contact:** Charles Ruffell (RWE Npower Plc)  
**Slant:** Against  
**Strictly Confidential:** No

**Abstract**

Mr Julian Majdanski  
Secretary, Modification Panel  
Joint Office of Gas Transporters  
Ground Floor Red  
51 Homer Road  
Solihull  
West Midlands  
B91 3QJ  
Your ref 0108  
Our ref  
Name: Charles Ruffell  
Phone: 01793 89 39 83  
Fax : 01793 89 29 81  
E-Mail charles.ruffell@rwenpower.com

12th September 2006

Urgent Modification Proposal 0108: Publication of Near Real Time Data at GB Storage Sites

Dear Julian

RWE npower does not support implementation of this urgent modification proposal.

The proposal argues that the implementation of modification 006 "Publication of Near Real-Time Data at UK Sub-terminals" will lead to information being disclosed that will reveal the market position of storage operators. In turn, this will create a number of market distortions that could result in volatile gas prices and even affect investment signals.

During the consultations for modification 006, RWE npower and a number of other respondents expressed similar concerns about the possible consequences of publishing real-time data about sub-terminal flows. We are still concerned that there is a significant risk of misinterpretation of this flow data and that this will increase price volatility.

However, now that modification 006 has been implemented, it is not clear that storage sites have a stronger case than that of other beach shippers/producers at certain sub-terminals to justify an exemption from publishing disaggregated flow data.

Furthermore, this additional data would be useful for transparency and the absolute amount of gas in store will be relevant to market participants' view on price, and should be disclosed.

We hope these views are helpful and would be happy to discuss matters further.

Yours sincerely

By Email So Unsigned

Charles Ruffell  
Economic Regulation