



Dennis Rachwall
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Dear Dennis

UNC Modification Proposal 0108 – Publication of Near Real Time Data at GB Storage Sites.

The following comments are offered on behalf of Shell Gas Direct Ltd (SGD). SGD is the holder of both gas supplier (non-domestic) and shipper licences respectively. This letter is not confidential and may be placed on your website.

SGD supports implementation of this modification proposal. We note the fact that all storage facilities, and not just those required to offer TPA, would consequently be treated differently to other NTS entry points.

The fact that this proposal has been raised merely indicates that concerns regarding commercial confidentiality and exposure following Ofgem's decision to approve UNC Modification Proposal 006 ('006') remain valid. In this instance, these concerns are in relation to the specific situation of *some* storage operators but they retain a more general application.

SGD notes that the issue of the exposure faced by TPA storage facility operators who *choose* to keep customer nominations 'whole' by buying/selling gas at the NBP if 006 were implemented, was raised during the consultation process for that modification. It is up to Ofgem to decide whether or not it had given sufficient weight to this and other expressions of concerns regarding commercial confidentiality and commercial exposure in deciding to approve 006. SGD believes not. If this view is correct, it then begs the question as to whether all the appropriate costs had been taken into account in the 006 impact assessment.

SGD would, however, like to register its agreement with Ofgem's disappointment at how UNC Modification Proposal 108 ('108') has been raised (see Ofgem's letter granting urgent status). Given that 006 was approved in May 2006, SGD finds it difficult to believe that the proposer could not have raised 108 in a more timely manner.

Yours sincerely

A handwritten signature in purple ink, which appears to read 'Amrik Bal', is located below the 'Yours sincerely' text.

Amrik Bal
UK Regulatory Affairs Manager, Shell Energy Europe

