

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

**Date of Communication:** 12/09/2006  
**External Contact:** Fiona Lewis(Bp Gas Ltd)  
**Slant:** For  
**Strictly Confidential:** No

**Abstract**

Dear Julian

**Re: Modification Proposal 0108: "Publication of Near Real Time Data at GB Storage Sites"**

Thank you for the opportunity to comment on the above modification proposal. BP is in support of this modification proposal and would like to make the following comments.

BP is fully supportive of the principle of appropriate market transparency and has, in the past, participated fully in work to improve information disclosure relating to gas production and its delivery onto the National Transmission System (NTS). However BP does not support the disclosure of information which is commercially sensitive to individual companies - a sentiment which Ofgem has recognised in past discussions with UKOOA and the DTI during 2003/04 and one which BP clearly stated in the debate surrounding UNC modification proposal 006.

We support the proposer's view that without this Modification Proposal, once Modification Proposal 006 is implemented on 3rd October 2006, storage operators will be amongst those parties that will be exposed commercially and potentially placed in a 'distressed shipper' situation because other market participants would know when a storage operator is in the market and could therefore charge a much higher premium for the gas the storage operator purchases at the NBP. BP considers that any instances of this type of behaviour would be discriminatory and would skew the competition in the wholesale gas markets between relevant shippers and suppliers.

BP is also of the view that publication of this information is likely to be commercially sensitive to individual companies and would, for example, expose storage operators unnecessarily to substantial risk in the event of an outage at their storage sites.

BP considers that the level of aggregation proposed in the modification is appropriate to strike a balance between placing storage operators in a 'distressed shipper' situation and allowing

sufficient information to be available in the market to 3rd parties to ensure transparency and a fully functioning market.

In summary, BP is supportive of this modification proposal because we consider that it better facilitates Relevant Objective (a) of the Gas Transporters Licence. Without this modification proposal, the status quo, effective from 3rd October 2006, could lead to higher gas prices that do not accurately reflect the prevailing supply and demand situation; therefore, implementation of this proposal would better support the economic and efficient operation of the pipeline system in relation to gas storage.

BP is also of the view that this modification proposal better facilitates relevant objective (d) of the Gas Transporters licence - "the securing of effective competition between the relevant shippers and suppliers". BP considers that this proposal would remove likely distortions in relation to storage which will in our view result from modification proposal 006, by preventing the distortion of competition between relevant shippers and suppliers.

BP continues to be of the view that commercial information should be provided to the market in an aggregated form that does not expose individual parties to commercial risk. Whilst BP is sympathetic to the arguments put forward by the Storage Operators, we do not consider that the points raised are unique to storage sites. BP considers that they are also relevant for other entry points. However, on balance, BP supports the implementation of the modification proposal.

We trust that our comments will be given due consideration.

Yours Sincerely

Fiona Lewis  
BP