



Mr. Julian Majdanski
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Dear Julian,

Re: Modification Proposal 0121: “The Provision of Ex-post demand information for all NTS offtakes”

The Association of Electricity Producers welcomes the opportunity to comment on this modification proposal. We offer comments only.

Whilst we recognize that the provision of information to the market is an influencing factor in the efficient functioning of that market, we have reservations as to whether this detailed level of information will actually facilitate efficient market and pipeline operation. From a CCGT perspective, we note that this provision of information only relates to NTS connected sites and not to DN connected sites as these would be aggregated within the individual LDZ offtake flow. This could be considered discriminatory between CCGT generators and could have unforeseen competitive effects in electricity markets. Such effects could arise where this information used in conjunction with information available from the electricity market BM reports enables station efficiencies and their degradation over time to be determined.

It is also not self evident that this level of disaggregated information is appropriate in order for shippers to better forecast demand as individual site level decisions will be made on a daily basis regarding running for the next day and whether this should be on gas or back-up fuels. Therefore historical data for individual offtakes may not be the best indicator of demand for future days. Information release at a more aggregated level as proposed in Modification Proposal 0130 or a more holistic market modeling approach may serve shippers better in this regard.

Please do not hesitate to contact me in case of any query.

Yours sincerely

Julie Cox
Association of Electricity Producers