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Dear Julian,

Representation for Modification Proposal 0121: “The Provision of Ex-Post Demand Information for all NTS Offtakes”

Wales & West Utilities (WWU) gives qualified support to the implementation of Modification Proposal 0121. WWU supports the principle that where data is widely available it should be published in a format that allows **all** market participants **access to it**. The National Grid Information Exchange website provides a suitable platform for these publications.

Publication of the proposed data would resolve the current asymmetry where Shippers have access to data relating to NTS/LDZ Offtakes and their own registered NTS sites through Gemini. This information is not currently available to DN Operators. However the proposal creates a new asymmetry where DN connected DM sites will not be listed however these sites will have access to data about NTS connected DM sites.

WWU is not convinced that the publication of this data will aid Shippers and consumers in identifying the level of demand side response achieved specifically where this response may have occurred with a DN. Throughput at NTS/LDZ offtakes can vary significantly from day to day, and by offtake within an LDZ, as a result of numerous factors other than changes in demand. For example, flow rates frequently vary as a result of DN stock changes, maintenance, operational requirements. To assume throughput changes are the solely the result of demand fluctuations or make assumptions about the level of demand side response would be difficult and could be misleading.

We do not believe that it has been demonstrated that the publication of the information proposed in the Modification would in any meaningful way result in improvements in the efficient or economic operation of the pipeline system or the efficient discharge of the licensee's obligations under licence.

Yours faithfully

Liz Spierling
Commercial Manager
Wales & West Utilities