



Mr. Julian Majdanski
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Dear Julian,

Re: Modification Proposal 0130: “The Provision of Ex-post demand information for NTS offtakes”

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

We recognize that the provision of information to the market is an influencing factor in the efficient functioning of that market. In our response to modification 121 we expressed some reservations concerning the publication of information for each offtake. In particular whether that level of detailed information will actually facilitate efficient market and pipeline operation, given the level of analysis required. Also potential discriminatory and competitive impacts on the electricity market by only publishing information relating to CCGTs connected to the NTS.

Furthermore we were concerned that forecasting future demand based on historical actual demand at the individual site level may be misleading when operating decisions to run on gas or alternative fuel are taken daily and within day based on many factors. We therefore consider that the publication of aggregate information will better serve the needs of shippers in forecasting demand than the publication of individual offtake information this in turn will facilitate the efficient and economic operation of the pipeline system.

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

Yours sincerely

Julie Cox
Association of Electricity Producers