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Dear Julian

**Representation for Modification Proposal 0130 “Provision of Ex-Post Demand Information for NTS Offtakes”**

Thank you for your invitation seeking representation with respect to the above Modification Proposal. National Grid NTS supports implementation of Modification Proposal 0130 as it believes that, judged on its own merits, it furthers the relevant objectives.

Modification Proposal 130 will require the publication of the previous Day’s total physical flows from the NTS divided into four categories. The provision of this information on National Grid’s website will improve information transparency and provide further information on the demand side behaviour.

Modification Proposal 121 is currently going through the governance process and is awaiting Panel recommendation on 15<sup>th</sup> March. This Modification Proposal requires publication of the previous Day’s total physical flows from the National Transmission System (NTS) by individual NTS Exit Point. National Grid NTS would like to acknowledge that it also continues to support Modification 121. Again, the Modification Proposal goes some way towards redressing the balance between supply side and demand side information albeit on a different timescale.

E.ON have raised Modification Proposal 130 because they believe that Modification Proposal 121 is unduly discriminating, as direct NTS connected and DN connected consumers may be in competition in the same market, and therefore DN connected consumers will be able to monitor gas use and potentially derive commercial advantage over their NTS connected competitors. We note however, that although Shippers have raised this issue within their responses no End User (or trade association) has opposed the implementation of Modification Proposal 121. We question therefore how important the aggregation of the data is to those parties that Modification Proposal 130 seeks to protect. Eon also suggest that aggregated data

may be easier to understand and interpret. This may be true but should be offset against the flexibility that users can enjoy by having direct access to the raw data and the ability to use that data as they see fit to suit their own analysis.

The cost of implementation of this proposal is currently being assessed on the basis that the proposal is implemented as a stand alone project. In reality National Grid NTS would seek to bundle the implementation into a larger package of work and therefore reduce the final implementation cost if possible. National Grid NTS will advise the Joint Office of the implementation costs as soon as they are available.

Yours sincerely

Chris Logue