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Dear Julian,

UNC Modification Proposal 0130: 'The Provision of Ex-Post Demand Information for all NTS Offtakes'

Thank you for your invitation seeking representations with respect to the above Modification Proposals. National Grid Gas plc (Gas Distribution) supports the implementation of Modification Proposal 0130.

As stated in our response to Modification Proposal 0121, it is our view that the aggregate approach to the publication of consumption data, as advocated in this proposal, provides appropriate transporter obligations to make after-the-day offtake information available without the potential of breaching the bounds of commercial sensitivity.

In terms of public domain data, the publication of aggregate offtake information by category, would bring the other offtake categories, (i.e., power stations, industrial loads, storage offtakes) into line with information published in aggregate, (by LDZ), for NTS / LDZ offtakes.

As stated in our response to proposal 0121, having visibility of individual consumption information for the offtake categories listed above is meaningless information if the viewer does not have knowledge of the underlying reasons for the consumption. These offtakes are not purely temperature sensitive demands; production runs, plant outages, raw material shortages and other economic factors affect consumption. Aggregate information smoothes such individual supply points variances and provides a better overall view of demand for these offtakes over time.

We believe implementation would provide a consistent level of public domain information between that already available for NTS /LDZ offtakes and other offtake categories; would smooth-out the effect of individual supply point / offtake point behaviour and, we believe provides a compromise solution that should be acceptable to all parties.

Consequently, we believe implementation would provide additional information to market participants and provide for better economic decision making, thereby securing more effective competition. This is consistent with the relevant objectives laid out in SSC11 of NTS's transporter licence, and accordingly, we believe this modification proposal should be implemented.

Yours sincerely,

Phil Lawton.