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Our Ref.
Your Ref.

15 January 2008

Dear Julian,

RE: Modification Proposal 0182: "Information provision at LNG facilities"

Thank you for the opportunity to comment on this proposal. British Gas Trading supports this proposal.

It is disappointing that this proposal is required in order to amend a modification that has only recently been implemented into Code; that being modification proposal 0104 – which now appears to be flawed.

Proposal 0104 required the publication of the total volume of LNG held in LNG importation facilities while awaiting send out. That proposal had a somewhat protracted passage through the governance process, as part of which Ofgem undertook a number of steps whilst deciding upon the merits of the proposal, including an IA, issuing two open letters and a draft decision letter.

In its decision letter, Ofgem made it clear that in a situation where more than one LNG facility was operational, but data was not available from all operational facilities, information published by NGG should show that the aggregate position across all facilities was unknown. This proposal seeks to implement this element which was missing from the original proposal.

Whilst we agree that this is the right thing to do in order to enact proposal 0104 as intended, we would also observe that this position now appears to be at odds with the intent of the European Third Package of energy legislation. That package of legislation clearly intends that information about stock levels at all LNG reception terminal must be published on an individual basis. Should this element of the third package make its way into UK legislation, it would seem that this proposal will again have to be revisited.

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In terms of relevant objectives, this proposal will better facilitate the promotion of efficiency in the implementation and administration of the UNC by clarifying exactly what National Grid should and should not publish in any given circumstance.

Should you have any queries with regard to this response please do not hesitate to contact me.

Yours sincerely,

Chris Wright
Commercial Manager