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23rd January 2008

Draft Modification Report 0182: Information Provision at LNG Importation Facilities – CIA Response

The Chemical Industries Association welcomes the chance to respond.

We note that this modification has rightly been raised by National Grid to clarify the situation in regards to the event in which one of the LNG Importation Facilities fails to submit data as required by UNC modification 104 that was implemented last year. At a time of volatile wholesale prices this additional information has been valuable.

The proposal of this modification gives cause for alarm, as it is highlighting the fact that National Grid may not receive adequate information from all LNG importation facilities. We would hope that any occurrence of incomplete or unreported data from an LNG importation facility would be a **very rare event**. The publication of data under mod 104 is an aggregate of all terminals, however currently only Isle of Grain (as the only commissioned LNG import facility) is reporting its figures and therefore there seems to be no current confidentiality issues. We therefore see no reason as to why new LNG importation facilities that will be commissioned in the future should choose not to report data to National Grid.

We agree with National Grids wish to seek clarification of when it is inappropriate to publish data because it may be misleading, but hope that any occurrence of this nature will be exceptionally unlikely. At a time when we are lobbying for increased information transparency across Europe (with the UK setting the example) it would be a shame to take a backward step and downgrade the effectiveness of UNC104. In fact we feel information regarding the stock levels at LNG importation facilities should be published on a terminal basis and not aggregated.

The CIA would therefore only support the implementation of this modification on the condition that the original implemented modification 104 is not adversely affected.



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