

Tim Davis  
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Dear Tim

**EDF Energy Response to UNC Modification Proposal 0182: “Information Provision at LNG Importation Facilities”.**

EDF Energy welcomes the opportunity to respond to this modification proposal and provide qualified support to the implementation of this proposal.

EDF Energy believes that whilst this proposal meets the relevant objectives, and clarifies NGG’s actions in circumstances when information is not available, we are not convinced that this is the best solution or exactly what Ofgem or market participants anticipated when Ofgem directed the implementation of modification proposal 0104. EDF Energy has long supported the principle of improved market transparency benefiting the competitive market, provided that the information provided is not commercially damaging to individual market participants, and so supported implementation of modification proposal 0104.

We therefore support this proposal as it provides clarity to the industry as to the actions that NGG will take when it has incomplete LNG stock data at time of publication. This will ensure that mis-leading information is not published to the market and so ensure efficiency in the implementation and administration of the code (SSCA11.1(f)). Further this proposal could also arguably facilitate the securing of effective competition between Shippers as market prices will be set on market fundamentals and not potentially inaccurate information (SSCA11.1(c)).

However we believe that a better solution would be for NGG to publish this information and provide clarity by indicating through text boxes which information was unavailable at the time of publication. This would have ensured that all of the information available to NGG was made available to the market, whilst ensuring that it was not presented in a mis-leading manner, and so would have facilitated the relevant objectives to a greater degree than this proposal. We further believe that it would have been better were NGG to clarify that in instances when the data was provided late NGG would have back filled the information so that it was available to the industry eventually. We would note that this is a common practice for NGG as part of its information provision, which it does in relation to real time data and NTS Entry End of Day flow data. We therefore believe that whilst this proposal does meet the relevant objectives, the disadvantage with it is that it is not the optimal solution.



I hope you find these comments useful, however please contact me should you wish to discuss these in greater detail.

Yours sincerely

A handwritten signature in black ink that reads "Stefan Leedham".

Stefan Leedham  
Gas Market Analyst  
Energy Regulation, Energy Branch