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### **Modification Proposal 182: Information Provision at LNG Importation Facilities**

Dear Julian,

RWE npower and RWE Trading GmbH support for the above modification proposal.

As the proposal points out, Ofgem's Impact Assessment into Modification Proposal 104 clarified that in the event operators at new LNG facilities are not willing to provide the relevant LNG stock information necessary for NG NTS to publish an aggregate LNG stock position, NG NTS should indicate that aggregate LNG stock levels are unknown. This was also stated in Ofgem's decision letter and so to the extent that Modification Proposal 182 has been raised to give effect to this statement of clarification we support the proposal.

It would appear from Ofgem's decision letter on Modification Proposal 104 that the intention behind such clarification was to avoid publishing potentially misleading information rather than because of specific concerns regarding commercial confidentiality. Ofgem stated that they would not have confidentiality concerns were information to be released only in relation to a single facility as it is already possible to derive a reasonable estimate of LNG stock levels at LNG facilities. They also pointed out that more than one shipper operates from each LNG terminal and that physical stocks do not necessarily provide an insight into a shipper's commercial position.

Therefore whilst we support not publishing aggregate information which may potentially be misleading, in the event NG NTS do receive stock levels from existing LNG facilities, and some (but not all) of the new LNG facilities, we see no reason why this information should not continue to be published on an individual basis.

The legal text provided with the proposal seems to support such an approach as whilst it states that NG NTS shall not be required to publish information received from any LNG Importation Facility, it does not state that NG NTS may not publish such information. As publication of LNG stock information is expected to be provided for in the relevant LNG connection agreements it would seem illogical not to publish this information, even though a complete picture of aggregate LNG stocks may not be available.

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Ofgem's decision letter on Modification Proposal 104 made it clear that they expected NG NTS to make every effort to obtain LNG stock information from operators, where appropriate through the terms of the connection agreements. As these are not visible to all shippers it would be helpful if Ofgem could, when making their decision on this proposal, indicate the extent to which NG NTS have fulfilled these expectations. This will provide shippers with a better view as to the likelihood of aggregate stock information being published as not available and the extent to which individual LNG facility may still be released, subject to NG NTS's discretion.

Yours sincerely,

Steve Rose  
Economic Regulation

Sent by e-mail and therefore not signed