



**Modification No 219 Publication of UK Wholesale Gas Market liquidity data**  
**Comments from AEP<sup>1</sup>**

The Association welcomes the opportunity to comment on this modification proposal.

The Association offers support for this proposal. We consider publication of this data in a user friendly format will provide a useful 'health check' for the UK wholesale market. The information will be of wider interest than just the shipping community. We would expect large consumers, trade associations and other organizations with an interest in energy markets both in the UK and across Europe to review this data from time to time and in that respect it would be helpful if the data were available in graphical format as well as the raw data.

**Extent to which implementation of the proposed modification would better facilitate the relevant objectives**

*Gas Transporter Licence Standard Special Condition A11.1*

- (d) *so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition:*
- (i) *between relevant shippers*
  - (ii) *and suppliers;*
  - (iii) *between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers;*

The Association generally believes that greater transparency of information leads to more efficient and competitive markets, by providing a level playing field between parties.

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<sup>1</sup> The Association of Electricity Producers (AEP) represents large, medium and small companies accounting for more than 95 per cent of the UK generating capacity, together with a number of businesses that provide equipment and services to the generating industry. Between them, the members embrace all of the generating technologies used commercially in the UK, from coal, gas and nuclear power, to a wide range of renewable energies.

**Analysis of any advantages or disadvantages of implementation of the Modification Proposal**

The Association agrees with the advantages and disadvantages listed in the draft modification report

8<sup>th</sup> December 2008