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9 December 2008

John Bradley
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
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UNC Modification 0219
"Publication of UK Wholesale
Gas Market Liquidity Data

Dear John

ExxonMobil Gas Marketing Europe welcomes the opportunity to respond to Modification Proposal 0219 and we would like to say that we support this Proposal.

The UK continues to be the most liquid market in Europe and it is important for both competition and security of supply that this liquidity be maintained. We believe that this modification could provide a 'barometer' for the health of the market.

We have read the response submitted to the consultation by National Grid NTS and we agree with them that the approach they have taken in publishing market data to date has been consistent with desires expressed by shippers in the Information Publication Review Group and we believe that this is an appropriate method for publishing information for those entities whose core business is the shipping or trading of gas and who are necessarily resourced and competent to poll and analyse such data. However, we believe that the benefit of this modification proposal is to provide easy access to market liquidity data to those entities that are not involved on a day to day basis in the marketing of natural gas and who do not have the resources to compile reports from raw data items. Transparency of aggregated information is beneficial to all market participants and should be easily available to all. Whilst we understand that National Grid has embarked on an agreed information publication strategy (MIPI), it would be regrettable if the opportunity to make this information available to a wider audience was missed due to a rigid systems development constraint.

In terms of better facilitating the Relevant Objectives of the Transporter's Licence we agree with the Proposer that this modification does meet the criteria, particularly in regard to 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*, because effective

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9 December 2008

Page 2

competition is enhanced by the provision of aggregated information which provides a clearer understanding of the market.

We hope that these comments are useful and if you have any questions regarding this response, please do not hesitate to contact me.

Yours sincerely

Joy Chadwick