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Modification Panel Secretary  
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Dear John

**Modification Proposal: 0219 Publication of UK Wholesale Gas Market Liquidity Data**

Thank you for providing Scotia Gas Networks with the opportunity to respond to Modification Proposal 0219. Scotia Gas Networks provides the following comments.

Scotia Gas Networks supports the intent behind the proposal which the proposer believes would provide potential benefits for all market participants, particularly customers/consumers. It has been suggested that by providing easier access to wholesale gas market liquidity data there will be potential benefits in terms of competition. As such the proposal better facilitates the relevant objectives. However, SGN has a number of points which we would like to note.

Review Group 0140 'Review of Information Provision on National Grids Information Exchange' concluded in October 2007 with a report of its findings to the UNC Panel in October 2007. The consensus of attendees at the Review Group was that data presentation on the National Grid Gas website should be amended to better reflect current requirements of Users in respect of information not covered by the Daily Summary Report. The group also reached agreement on the definition and presentation of the individual data item.

Individual data items are currently made available in a user defined downloadable format as either CSV or xml files. On 20.11.08 Panel did not recommend implementation. We are awaiting a response from Ofgem. Users are able to select specific data, download it and then manipulate it to support their own requirements rather than be limited to predefined report formats as has previously been the case. The specified data items in this Modification Proposal are already published and available for Users to download from the National Grid website. Whilst the cost of amalgamating and presenting data in a more User friendly format are in this case minimal at between £20,000 to £65,000 and potential benefits in terms of market liquidity and competition are likely to outweigh the cost, we are concerned that this should not set a precedent that undermines the principle set out above. It is not always be appropriate for Transporters to be exposed to additional costs, when data is already available in raw form for Users to manipulate for their own use. Furthermore SGN consider it to be essential that each proposal should continue to be considered on its own merits.



We hope you find these comments helpful.

Yours sincerely

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