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8th December 2008

Re: UNC Modification Proposal 0219 “Publication of UK Wholesale Gas Market Liquidity Data”

Dear John

Thank you for the opportunity to comment upon this Modification Proposal, I can confirm that we, WWU, are **not supportive** of its implementation.

Over the last few years National Grid NTS, as outlined in their own Representation, have been at the centre of the development of the publication of industry information. The Uniform Network Code Review Group 0140 made a number of recommendations and these have subsequently been delivered through changes to the National Grid website and amendments to the Network Code Operations Reporting Manual (NCORM). The changes to NCORM have included moving away from standard reports and the development of a ‘data dictionary’ approach. This allows greater flexibility as users are able to download and create their own reports with the data items that are available.

It seems that the data items that this Modification Proposal relates to are important and of value to the industry. Three of the values are already publicly available via the National Grid website. We agree that the extra data item, “Number of Traders”, should be made available to users but we are not supportive of the method of delivery that this Proposal seeks to establish.

The NCORM document places an obligation on National Grid NTS to publish, on a best endeavours basis, the reporting requirements contained within it. Although the obligation to provide the information is upon National Grid NTS, it does not preclude any Users, or other Transporters, putting forward proposed amendments to NCORM for National Grid NTS to consider. Section 3 of NCORM (“Modification”) states:

“National Grid NTS and the Uniform Network code Committee or any relevant Sub Committee will meet to discuss modifications to this Report Manual as required and National Grid NTS will consider revisions to the Reporting Manual in the light of these discussions. All modifications will also be presented to the UK Link committee for information only.”

24 hour gas escape number
Rhif 24 awr os bydd nwy yn gollwng

0800 111 999*

*calls will be recorded and may be monitored
caiff galwadau eu recordio a gellir eu monitro

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Registered in England and Wales: No. 5046791



We believe that a proposed change through NCORM, with the appropriate industry discussion, would have been the most appropriate route for Users to obtain this additional data item. We are not generally supportive of additional such standard reports being introduced into Section V of the UNC TPD and, in this case, are not supportive of this Modification Proposal.

If you have any questions in relation to this Representation then please do not hesitate to contact me.

Yours sincerely

Simon Trivella
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