



**Modification No 223 Provision of dayahead gas flow nomination data at major aggregated system entry points**  
**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 recognize the importance of supporting initiatives to progress the single European market and the role of the GRI transparency project in this respect. However we note that this proposal goes beyond what is required by the transparency project.

**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, so long as commercial interests and confidentiality concerns are adequately addressed. In this respect since large ASEPs generally flow gas from more than one shipper and there is protection for small ASEPs (<10 MCM/d) then we believe this proposal will facilitate the relevant objectives.

As regards the detail of the proposal we consider the second option to publish a net value at points capable of flowing > 10MCM/d where there may be both

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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.

input and output nominations would be most appropriate and be less misleading than publishing zero for input nominations where there is a net negative position. However we note this is again beyond the remit of the GRI initiative.

We would also note that as nominations may be changed after 1800 D-1 then it is not entirely obvious just how useful this information will be to the market.

### **The implications of implementing the Modification Proposal on security of supply, operation of the Total System and industry fragmentation**

We agree that a properly functioning European market should be a positive thing for security of supply and that this proposal makes a small contribution to that aim.

### **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

13<sup>th</sup> October 2008