



Mr. John Bradley
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Our Ref.
Your Ref.

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Dear John,

RE: Modification Proposals 0223: "Provision of day ahead Gas Flow Nomination data at major Aggregated System Entry Points"

Thank you for the opportunity to comment on this proposal. British Gas supports its implementation.

Centrica has been at the forefront of the push for continental market transparency, and we recognise that this proposal has been brought forward in order that National Grid should fully comply with what will be required of all transporters within the GRI transparency project. These requirements, in turn, are based upon what is anticipated to result from measures to be undertaken following the "Third Package".

We welcome this push towards greater transporter transparency, although do not believe that the data proposed for publication will necessarily deliver significant incremental benefits to parties within, or looking to take part in, the GB market, given the level of transparency that already exists compared to certain other markets. Rather, we see the value in encouraging other European transporters to adopt a similar degree of transparency, within the NW regional market.

It should be recognised that this proposal is being put forward significantly ahead of formal agreement of the "Third Package" of European energy market reforms, and ENTSO-G's development of network codes as envisaged in the Gas Transmission Regulation. Therefore, while this proposal may be viewed as beneficial to the GB market in its own right, it should be recognised that a further UNC modification proposal/s could be necessary should the final outcome in respect of publication of input nominations differ from that which is currently proposed.

We would also put forward two further observations. First, that early adoption of this proposal within the GB market, significantly ahead of certain other member states, will further extend the gap between different markets in terms of commonality of arrangements at a time when harmonisation is being sought. Second, it is our understanding that the term “input nomination” has different meanings in different markets, and while these discrepancies remain it is questionable the extent to which this proposal will help align market transparencies and so materially assist gas shippers within the NW regional market.

Should you have any queries with regard to this response please do not hesitate to contact me.

Yours sincerely,

Chris Wright
Commercial Manager