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National Gas Emergency Service - 0800 111 999* (24hrs)
*calls will be recorded and may be monitored

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13th October, 2008.

Your Reference: Modification Proposal 0223

Dear John,

Re: Modification Proposal 0223: 'Provision of day ahead Gas Flow Nomination data at major Aggregated System Entry Points'.

Thank you for your invitation seeking representations with respect to the above Modification Proposal.

National Grid Gas plc, Distribution (NGD) would like to offer support for this proposal which, if implemented would require NTS to publish additional Operational and Market Data in accordance the UNC TPD, Annex V-1 in relation to ASEP Gas Nominations.

The drivers behind this proposal have been detailed in the letter from NTS dated 19th September 2008. The publication of this information is viewed as an important step towards understanding the operation of European Gas Markets. With greater understanding comes the possibility of further liberalisation and the establishment of regional markets. We also support NTS's initiative to include all ASEPS, and not just "cross border interconnection points", as necessary to avoid undue discrimination within the market for gas entering the UK.

The proposer states that implementation of this proposal would provide more information about European gas movements and hence would increase the understanding of the functioning of individual gas markets. Access to, and publication of, this information is consistent with furthering the relevant objective in Standard Special Condition A11.1 (d) and would assist with the securing of effective competition between relevant shippers.

We agree with this point and accordingly, NGD supports implementation

Please contact Alison Chamberlain on 01926 653994 (alison.chamberlain@uk.ngrid.com) should you require any further information with respect to the above.

Yours sincerely

Richard Court Commercial Manager, Distribution.