BOC Process Gas Solutions (BOC) response to "Offshore gas production information disclosure. Initial consultation and draft impact assessment, February 2005'

BOC welcomes the opportunity to respond to the above subject, which we believe is very important.

BOC, as well a being an industrial natural gas user, is one of the largest industrial electricity users in the UK. Presently the change in the price of natural gas has a direct relationship to the electricity price. This being the case BOC believes that a properly functioning wholesale gas market is a necessary condition for a properly functioning electricity market.

Most recently both the prices reported from the gas and electricity market appear to be showing very high volatility. Market information on supply and demand matters over short and longer time periods are essential to understand price movements and make the best commercial decisions.

It is important; therefore that all players directly or indirectly participating or effected by the wholesale market should have equal access to information. That is the same information at the same time. BOC believes any other approach to be unfair and in some markets, such as equity stock markets, acting on "inside information" is unlawful.

It's BOC's view that a licensed and/or legislative regime of information disclosure would be preferable to voluntary arrangements.

BOC is happy to see voluntary schemes in place as interim measures while the necessary information infrastructure systems are put in place. BOC would look askance at any suggestions that any party would seek to withdraw from such a scheme.

BOC believes that Ofgem should therefore take all necessary steps to provide the greatest and most timely information disclosure.

Hugh Mortimer, 15 March 2005