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For the Attention of Sonia Brown –
Director, Markets

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Our Ref.
Your Ref.

11th November 2005

Dear Sonia,

Re: UNC Modification Proposal 006 “3rd Party Proposal: Publication of Near Real Time Data at UK sub-terminals”

Thank you for the opportunity to comment on the initial release of data by Ofgem as part of your development of an Impact Assessment for this proposal.

British Gas Trading (BGT) supports the release of additional information to the market where that information adds value (relative to the costs). As such we have supported the DTI/UKOOA/NGT/Ofgem work to develop a voluntary scheme for information release which has culminated in the release of aggregated information.

Our opinion of the data provided under that programme to date is that there are some small benefits to the market to see where the gas is coming from and identify limited locational changes in the system inputs. We have therefore utilised the data as a small incremental step in terms of our understanding of the way that the system balance is being maintained and hence any likely impact on prices.

Looking ahead to the data that could be provided if UNC006 were to be approved (based upon the sample provided) we do not see any increased value to our business from this data as without any explanatory text it has no perceived meaning. In addition the variation in the flows recorded by the data at some locations due to its granularity is more likely to have an adverse impact on the market. In addition we have seen no update on the question of liability surrounding the provision and use of this data. There would therefore appear to be implications for National Grid in the publication of the data and for Users in relying on it. We would therefore request clarification from Ofgem on this point.

However, despite seeing no value in the data, if it were to become available we would expect to have to incur some additional costs in terms of limited monitoring (either through the creation of new systems or the imposition of overheads on manpower to monitor and manage the data flows). We therefore still do not support this proposal.

As stated earlier we support the release of additional information to the market where it adds value. Since the GB market is now recognised as being inextricably linked to the continental European markets we would see more benefit from Ofgem lobbying for greater transparency and information disclosure in these markets than in the UK.

Should you wish to discuss any of our comments, please do not hesitate to contact me.

Yours sincerely,

Simon Goldring
Head of Transportation