

Eni UK

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NSGP/LET/PS/ys/.../05

10 November 2005

Sonia Brown
Director, Markets
Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

Dear Ms Brown

**Response to “Publication of Near Real Time Data at UK sub-terminals” Modification
Reference Number UNC 006 (0727) – Proposed Impact Assessment**

In this letter, we have set out our views in response to Ofgem’s letter requesting feedback on the current production data provision arrangements and Energywatch’s proposed changes.

Eni UK maintains the view that the proposal put forward by Energywatch does not provide any benefit to customers in excess of that already obtained through the publication of production data on a North/South basis.

Eni UK considers that the publication of further detail at the sub-terminal level presents significant issues. Firstly we do not see any benefit to the market of having data at an individual sub-terminal level when the market is currently based upon a single UK (or NBP) price rather than 16 sub-terminal prices. Therefore the data that are relevant for the UK market are those based upon aggregate production flows rather than detailed sub-terminal flows. We therefore view the provision of very detailed production data as both unnecessary and costly as highlighted by National Grid.

Secondly, Eni UK is concerned that this proposal may place the system operator, National Grid, in breach of their legal and confidentiality agreements which is clearly undesirable. Furthermore, Eni UK is also concerned that frequent actions by the regulator to change the environment in which producers operate can only act as a disincentive to further investment in the UKCS.

In summary, Eni UK does not support the implementation of this modification proposal.

We hope our comments will be given due consideration before a final decision is made with regards to the publication of real time data.

Yours sincerely,



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