

ExxonMobil International Limited
St. Catherine's House
2 Kingsway, P. O. Box 394
London WC2B 6WG
020 7412 4274 Telephone
020 7412 2650 Facsimile
chris.crane@exxonmobil.com

Chris Crane
Regulatory Advisor



10 November 2005

Ms Sonia Brown
Ofgem
9 Millbank
London
SW1P 3GE

Uniform Network Code (UNC)
Modification Proposal 006

Dear Sonia,

Thank you for the opportunity for ExxonMobil to comment on the Uniform Network Code (UNC) Modification Proposal 006 "3rd Party Proposal: Publication of Near to Real Time Data at UK Sub-Terminals".

In our opinion the publication of a sample of disaggregated sub-terminal data on a "real-time basis" for the period 12 to 18 September 2005 has not presented any incremental value to information already available. The sample data provided has reinforced the concerns that ExxonMobil has raised in previous responses to Ofgem consultations on Offshore Gas Production Information Disclosure (16 March 2005) and the Impact Assessment regarding Modification UNC 006 (27 June 2005).

In March 2004 after lengthy discussions led by the DTI with UKOOA, Transco and including Ofgem, a multi-party agreement was reached to release hourly data aggregated at a National, North and South zonal basis to protect commercially sensitive information. The proposed release of sub-terminal information on a "real-time basis" disregards these discussions and where disaggregated data discloses commercially sensitive information there can be an expectation that the affected party(ies) will seek economic redress.

We remain of the view that this modification proposal for further information in addition to that already available is not warranted and the UNC modification proposal 006 should be rejected.

We are aware of a response being sent by UKOOA and we support the conclusions that they draw. If you require any further clarification please do not hesitate to contact me.

Yours sincerely

Chris Crane

Registered in England
Number: 3834848
Registered Office
ExxonMobil House, Ermyn Way
Leatherhead, Surrey KT22 8UX

An **ExxonMobil** Subsidiary