

Laura Cork

From: Robertson, Jim A (UK) [jrobertson@uk.terrainindustries.com]
Sent: 13 April 2007 08:45
To: wholesale markets
Cc: Vincent, Dominic
Subject: UNC 104 IMPACT ASSESSMENT - FAO Hannah Cook

SUBJECT: 3rd Party Proposal: Storage Information at LNG Importation Facilities. Modification Reference Number UNC 104

I refer to the above Impact Assessment (Ref 38/07) to which you have invited responses.

Terra Nitrogen (UK) Limited has consistently supported the principle of improving market transparency through the provision of key information to all market participants on an equitable basis.

We acknowledge the improvements that have been made in this area, in particular following the implementation of Mod 006 which now appears to be reaping benefits to the market. We also note the desire by the many interested parties in the wider European market to see improved levels of transparency across the wider European market.

It is apparent that the implementation of UNC 104 is a further step in helping transparency and we strongly support implementation.

The low cost versus the large benefits provide a very compelling case.

We note the intention to publish aggregated information. We believe disaggregated information should be made available. In other words we are extremely disappointed that this modification goes nowhere near far enough.

It is essential that information is available from the 1st October 2007 at the latest and preferably sooner.

Failure to provide this data in the UK would set a poor example to our colleagues in the rest of Europe in the fight for effective liberalised markets.

We strongly support this proposal as a first step and urge implementation as soon as possible.

Dr J A Robertson
Energy Director
Terra Nitrogen UK Limited