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Wednesday 2<sup>nd</sup> March 2005

**Response to Modification proposal 727: 3<sup>rd</sup> Party Proposal:  
Publication of Near Real Time Data at UK sub-terminals**

Dear Julian

E.ON UK supports the implementation of this modification proposal.

More transparency in the operation of the upstream UK gas market and the UK-continental interconnector operations should be encouraged. This proposal will improve overall market confidence and market efficiency provided such disclosure does not unduly disadvantage market participants through the exposure of individual commercial positions.

In considering what information should be disclosed in any particular market, E.ON UK believe it is important to consider how market participants use that information and whether particular parties obtain unfair relative advantage as a result. The 10 mcmd de minimus level will protect a number of key downstream buyers, who are active in generation, shipping and supply, who might otherwise find themselves in a distressed purchase position.

At this stage unrestricted disclosure of a 'real-time' flow data at smaller single user entry points would inadvertently favour sellers under certain circumstances. The current typical level of liquidity in the gas wholesale market is such that it would prove difficult for shippers and 'end-user' shippers to purchase larger volumes of gas within-day without moving the gas price significantly. Overall the right balance between the commercial interests of buyers and sellers (producers) seems to have been achieved by this proposal.

In our view the disclosure of near real-time information as specified in the energywatch proposal will improve the efficiency of the gas wholesale market, which will in turn facilitate the applicable licence objective 9 (c) the

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securing of effective competition between relevant shippers and between relevant suppliers.

Please do not hesitate to contact me if you wish to discuss any of the above.

Yours sincerely

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