

03 April 2006

Julian Majdanski  
Network Code Manager  
Transco  
31 Homer Road  
Solihull  
B91 3LT

Dear Julian

**GAZ DE FRANCE ESS (UK)  
LTD**

1 City Walk  
Leeds  
LS11 9DX  
United Kingdom

tel: +44 (0)113 306 2000  
fax: +44 (0)113 245 1515

[www.gazdefrance.co.uk](http://www.gazdefrance.co.uk)

REGISTERED IN ENGLAND  
NO. 2706333

**Response to: 3<sup>rd</sup> PARTY NETWORK CODE MODIFICATION PROPOSAL No. 0727 – “Publication of near real time data at UK sub-terminals”**

Gaz de France ESS is able to give qualified support to this proposed modification.

Gaz de France ESS fully support the principle of timely information provision with regard to gas entry flows. We agree with the proposer that timely information should be made available to enable a level playing field for all market participants and should help provide a more stable environment where customers can make rational purchasing decisions. We perceive there to be significant market benefits gleaned from close to real-time data for both non-integrated suppliers and customers.

However, there is further clarification needed to assess the relative benefits of information provision at sub-terminal level as opposed to aggregated, given the high costs assigned here. Also, the liabilities highlighted by Transco with regard to data ownership and confidentiality needs to be addressed.

We are aware that significant progress has been made recently in the form of the DTI Information initiative and this should go some way towards bringing about many of the benefits outlined with this modification proposal. Input flows aggregated at North/South level as planned for implementation in phase 3 may be sufficient for market participants to determine potential supply side effects on NBP prices.

A reasonable amount of time should be afforded to monitor the effectiveness of this Information Initiative before pushing for further granularity however. If, after review, the category 1 and 2 information proves to be as ineffective as first hoped, then a modification of this nature should be explored. Under these circumstances, a suggested implementation date would be October 2006, allowing time for a review of the previous 12 months.

If you have any queries regarding this response please contact me on 0113 3062104.

Yours sincerely

**Phil Broom**  
**Regulatory Affairs Analyst**