

## **Representation For. 0006(0727)**

"3rd Party Proposal : Publication of Near Real Time Data at UK sub-terminals"  
Version 2.0

**Date of Communication:** 02/03/2005  
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**Slant:** For  
**Strictly Confidential:** No

### **Abstract**

INEOS Chlor Limited is a large industrial consumer of gas with an annual consumption of around 250 million therms/year.

We would make the following points in response to the above consultation.

We give our full and unequivocal support to the Energywatch proposal. The proposal aims to ensure that all gas market participants have as far as possible equal access to information. This is vital to ensure we have an effective and efficiently operating market.

We note the efforts of Energywatch to demonstrate the Cost/Benefit analysis for the proposal and we find that the case made is a strong one. Indeed, our perception is that Transco also find the proposal compelling while still coming down against it.

In the last couple of weeks, while the prompt NBP gas market has descended into chaos and panic, we have spent quite literally hours studying and analysing available data to try and make sense of prices. We have found that current data is at best around 1.5 hours behind the market (in the case of Demand and PCLP data) and in most cases two days behind (e.g. Terminal supplies). This has confirmed to us how disadvantaged we are as consumers as we are only able to look at data and then try and assess why prices have moved the way they did. It does not help us make informed decisions. We also consider that the additional data promised for later this year will still not provide adequate asymmetry of information.

In summary, we give our full support to the Energywatch proposal. It is essential, not an option to allow the effective functioning of the forward and prompt markets.

yours

Andrew Mackenzie  
Gas Purchasing Manager