



Modification Panel Secretary  
Joint Office of Gas Transporters  
Ground Floor Red  
51 Homer Road  
Solihull  
West Midlands  
B91 3QJ

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Dear Julian,

**Modification Proposal 0097/0097a Modification release aggregated ex-post information for pipeline interconnector offtake flows**

Thank you for providing SGN with the opportunity to comment on the above Modification Proposal.

SGN is supportive of Modification proposal 0097a and not supportive of Modification proposal 0097.

SGN believes that implementation of either Modification could better facilitate the economic and efficient operation of the pipe-line system in so far as they will provide additional information to all Shippers, large customers and any other interested party which could enable them to better understand demand, market response to changes in demand and price movements. However SGN note that demand on the previous day is not always an indication of future demand. Such information is only of value in so far as it is interpreted appropriately by users, and could be misleading.

SGN believes that by publishing information on the NG website this will ensure information is made available to the widest possible group of interested parties. Information would be completely transparent and easily accessible to all. Information provided through Gemini, will only be accessible to a limited group of interested parties. By ensuring information is accessible to customers, we believe there is added potential for appropriate demand side response which could further improve efficiency of the system and the balance of the system.

One of the main justifications for Modification Proposal 0097 appears to be that publication of information on the Gemini system would ensure that data could be easily downloaded into Users' risk management and forecasting systems. It is not clear how much data will be provided but as it is aggregate daily flow per offtake it would appear that this could easily be downloaded manually. It is not clear at this stage what the Gemini implementation costs would be. We understand they are still being considered but it is indicated in the Draft Modification Report that they are likely to be in excess of £120,000 which is the cost of implementing changes through the National Grid website only. It is not clear that the added benefit of providing information through Gemini under Modification Proposal 0097 justifies additional expense or would significantly improve efficiency. Indeed we would agree with the Proposer of 0097A, that such additional expense and duplication could be seen as inefficient.

We note that parties involved in the export of gas through interconnectors have indicated there could need to amend contractual arrangements with customers. Whilst the Proposer of

0097 is keen that arrangements should be implemented this winter, we believe the implementation date should fully take account of timescales required to resolve system and contractual issues to ensure compliance with this proposal.

We hope you find these comments helpful.

Yours sincerely

Bali Dohel  
Scotia Gas Networks  
DirectTel: 01689 886780  
Direct Fax: 01689 880706  
Email: [bali.dohel@scotiagasnetworks.co.uk](mailto:bali.dohel@scotiagasnetworks.co.uk)