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Dear Julian,

RE: Draft Modification Report 0097/0097a: Release of aggregated ex-post information for pipeline interconnector offtake flows.

Thank you for the opportunity to comment upon this modification proposal.

British Gas Trading (BGT) has given careful consideration to both modification 0097 and its alternate, both of which aim to publish ex-post information on an aggregated basis. We offer both proposals our qualified support, and express a preference for the original proposal rather than the alternate. We set out our thinking in more detail below.

Given that information about flows on the IUK interconnector is currently available through the IUK web site, the most significant aspect of this proposal would be the availability, for the first time, of data relating to flows on the Moffat interconnector.

At the simplest level, we recognise that this information could be of benefit to some parties within the industry, and could potentially assist in increasing Users' understanding of demand profiles within the Great Britain market.

Further, to the extent that there are multiple shippers on the interconnectors concerned and the proposal is to publish aggregated data, we are reassured that Users' commercial positions will be protected. We believe that this fact adds significant merit to this proposal.

We have also considered this proposal in the broader context of the European market. Regulation (EC) No 1775/2005 could be interpreted to require the publication of such data by the relevant transporter, and we would welcome greater transparency across all national markets. Rather than unilaterally extending and increasing transparency within the GB market which, it is generally recognised, already sets the benchmark for information disclosure in respect of cross border gas flows, ideally we would like to see this proposal develop in parallel with similar arrangements across all European countries.

However, recognising that it is not within the remit of this proposal to require this, we instead qualify our support on the basis that, if implemented, Ofgem in particular continues to do everything possible to encourage Europe-wide reciprocity (e.g. via ERGEG).

Our support for this proposal hinges on the belief that this asymmetry of information between GB and other European markets will not give rise to any significant detriment to GB markets or consumers. However, we will obviously consider any further information related modification, such as 0121, on their individual merits. To this end, we welcome discussions within the Transmission Workstream which seek to understand optimum levels of transparency across the industry.

Of the two proposals, given that we are not aware of specific costs, the original modification proposal – 0097 – would be our preferred option. This is on the basis that publication on Gemini is likely to more readily allow Users to drag the information from Gemini into their specific energy/market analysis tools.

Please don't hesitate to contact me if you have any queries about this response.

Yours sincerely

Chris Wright
Contracts Manager