Representation – Terra Nitrogen

Modification Proposal UNC 0104

Date: 27 November 2006

Abstract:

For the attention of Mr Julian Majdanski

Terra Nitrogen is a significant consumer of natural gas in the UK. We welcome the opportunity to comment on this modification proposal.

Terra Nitrogen (UK) Ltd wishes to support this modification. Given the high volatility in the UK gas market, market transparency is a vital to enable large consumers to make informed decisions on operations and gas consumption. The gas industry continually emphasises the role of demand side response in balancing the UK market. Demand side response will only be truly effective if the demand side is given clear factual information on which to base decisions.

While the UK has only a single LNG terminal it is particularly important that the physical LNG stock is published on a D+1 basis. In the present circumstances we believe that an LNG terminal ought to be regarded as a storage facility and therefore information should be provided to the market as if it were a storage facility.

Implementation of the Modification is good for UK consumers and will send an important signal to industrial consumers that the UK is serious about operating a free, competitive market where information is freely available.

Regards

Jim Robertson