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National Gas Emergency Service - 0800 111 999* (24hrs)

*calls will be recorded and may be monitored

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Dear Julian

Representation for Modification Proposal 0123 "Provision of Demand Information to Meet the 14:00 Total System Demand Forecast"

Thank you for your invitation seeking representation with respect to the above Modification Proposal. National Grid NTS supports implementation of Modification Proposal 0123.

National Grid NTS raised Modification Proposal 0100 in order to seek improved information from those connected to our network. This information would be used by ourselves to better inform our 14:00 D-1 demand forecast which is published to the The OPN route was chosen as a means for providing this additional information as it was an established and understood mechanism, supported by existing systems, which has historically proven to yield relatively accurate predictions (albeit later in the day).

During the development and consultation phases for 0100 we were made aware that some parties including the DNs would be required to amend their processes, and possibly contracts, in order to fully implement the requirements. No party however said that they would be unable to implement the proposal or gave an alternative timetable for implementation. National Grid NTS welcomed Ofgem's decision to approve 0100. However, following publication of the implementation notice for 0100 we received correspondences from the DNs expressing concern about the implementation date. In light of these concerns we cooperated in a joint approach to Ofgem to request a delay to implementation in order to allow time for all the issues to be properly assessed and addressed.

Modification Proposal 0123 represents an alternative approach to providing information to inform the D-1 14:00 forecast that will be easier and less costly to implement from a DN point of view. The new information to be provided, by the DNs, will include the LDZ stock-change forecast which previously is only revealed in the OPNs. We however, would encourage all parties who are able to, to submit full OPNs rather than the option of summarised OPNs as this will save them from needing to submit a later OPN (assuming that the offtake prediction is unchanged) and is more compatible with our control room systems. In particular all parties will be encouraged to submit their OPNs in electronic format using the recently introduced functionality to communicate directly with our systems. We believe that this will lead to efficiency savings both for ourselves and the connected parties.

We note that the new information will be provided by DNs by 13:00 (typically 12:45) reflecting current operational practice for providing LDZ demand forecasts. This is later than the 12:30 time required under UNC 0100 and is likely to lead to a delay in the publication of our total demand forecast when compared to typical current publication time of approximately 13:00, we will however remain compliant with our UNC obligation and continue to provide a forecast by 14:00 and are therefore able to support the change in timings.

In summary National Grid NTS support the aims of Proposal 0123 and believe it to represent a pragmatic solution to the potential difficulties that UNC 0100 causes the DNs.

Yours sincerely

Chris Logue