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Submission on Modification 100: Amendment to OPN/SFN submission times.

Bord Gais Energy Supply (BGES) welcomes the opportunity to make a submission on NGG's proposed Mod 100 "Amendment to OPN/SFN submission times".

BGES acknowledges NGG's wish to improve the efficiency and accuracy of the demand forecasting process, but a number of disadvantages to proposed mod 100 have been identified. As a shipper of gas from the UK to Ireland, BGES complies with the requirements of the Moffat Agent and the provisions of this mod would have direct implications for the Moffat Agent and consequent knock on effects for Moffat shippers.

The Moffat Agent has submitted a response on behalf of Moffat shippers and BGES support the Agent's position that implementation of this Modification will lead to unnecessary additional costs and operational burden. Specifically, BGES would like to identify the following specific disadvantages to the proposed Mod:

- BGES is dependant on gathering information from its customers prior to submitting its own nomination before the 10:00 am deadline to the Moffat agent. The proposal would see this deadline being brought forward to meet the revised requirements of the OPN. As a result earlier estimates of demand may be inaccurate and this could lead to increased renominations after 18:00 on D-1, or in some cases, no nominations being submitted before 10:00am on D-1 to the shipper from customers.
- BGES would have to amend existing contracts with larger customers in order to produce nominations earlier. This would directly contribute to increased costs to both the shipper and customers as existing systems and procedures will have to be changed.
- To date, the existing processes at Moffat have been working to a very acceptable level and BGES sees no tangible benefit to either shippers or customers to any change in submission times.
- One of the main perceived benefits to the proposed Mod was a potential to reduce the gas price volatility to market participants. But if earlier demand forecasts are perceived to be inaccurate or incomplete this in turn could lead to less trust in the early publications of such forecasts and so may have a perverse impact on the market.

In summary, BGES fails to identify any tangible benefit to the proposed Mod and therefore is not in favour of its implementation.

Regards,

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