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Modification Proposal 130: The Provision of Ex-Post Demand Information for NTS Offtakes

Dear Julian,

RWE npower offers qualified support for implementation of the above modification proposal.

Our support is qualified on the basis that we would prefer such information to be published on a nodal basis, as proposed in modification proposal 121.

Whilst we believe provision of aggregated offtake information is more than sufficient to enable market participants to make efficient decisions about their daily trading/purchase/balancing decisions, because disaggregated gas supply information is now available, any fundamental analysis of gas flows on the NTS that parties may choose to undertake could not be undertaken properly without disaggregated offtake information also being provided.

We believe the potential of any adverse impact, or discrimination, against I&C consumers arising from the publication of nodal NTS offtake data has been overstated. Also, the fact that some disaggregated demand data is already made available to shippers via the Gemini Meter List, suggests that discrimination could be avoided by publishing all NTS Offtake data retrospectively on a nodal basis.

Yours sincerely,

Steve Rose Economic Regulation

Sent by e-mail and therefore not signed

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