

**Modification Report**  
**Modification to release aggregated ex-post information for pipeline interconnector offtake flows**

**Modification Reference Number 0097/0097a**

Version 2.0

This Modification Report is made pursuant to Rule 7.3 of the Modification Rules and follows the format required under Rule 9.4.

**1. The Modification Proposals**

**Modification Proposal 0097**

Version 2.0 of Proposal 0097 was as follows:

"This proposal requires that the previous day's aggregate actual offtake flows for each pipeline interconnector be included on the Gemini Meter Energy List and published on the Gemini system as per the current arrangements. In addition this revised Gemini Meter Energy list (both input and offtake) data shall be published by 11.00am on the following day on NGG's website. Although exactly where the information is published on the NGG website would be at NGG's discretion it is suggested that it should be placed under the "Operational data" section. In particular it is suggested that Irish and UK-Continental interconnector historical export flows could be represented graphically. Such a graphical representation could form part of the Daily Summary Report<sup>1</sup> or be linked to it in some way.

It is important for shippers that interconnector offtake flows are published on the Gemini system so that they can easily download such data into their risk management and forecasting systems. Nevertheless, publication on the website should not be delayed by any system development work reasonably deemed to be necessary for implementation of the 'Gemini solution'. If necessary the publication of interconnector offtake data on the NGG website should be implemented first preferably in early Winter 06/07. Implementation of the Gemini solution would then follow as soon as is reasonably practicable.

It is important that the industry does not solely rely on a single forecast and so publicising aggregated interconnector flows after the day will provide Users with the appropriate level of information to forecast demand more accurately and as a result, reduce price volatility through enabling the market to better understand price movements, building confidence and facilitating security of supply. This is of particular importance on tight demand days as Users need to assess the system as a whole in order to make appropriate purchasing decisions.

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<sup>1</sup> Overall historical 'demand' is already shown on the Daily Summary Report and interconnector exports could be represented in a similar way. A graph splitting up overall historical demand as follows might prove useful to shippers and customers alike:

- UK gas consumed (including shrinkage)
- Irish Interconnector Exports
- UK Continental Interconnector exports
- Storage Injections

Winter 2005/06 saw a material reduction in the level of demand, in response to the prevailing high prices. This proposal will assist Users in ascertaining what proportion of that demand is exported through the interconnectors and consequently aid understanding of the energy outlook during the winter.

NGG have stated in their 2005 Ten Year Statement, with respect to the Irish interconnector, that ‘...any factors impacting upon existing demands, or the scale and timing of new gas-fired developments, will tend to have an effect on the accuracy of the forecast. Although growth in the Irish economy has slowed recently, it is forecast to increase over the forecast period with the rate of growth being a significant forecast sensitivity.’

Owing to the substantial forecasting sensitivities surrounding demand through the Irish interconnector, there is a clear benefit associated with publishing ex-post data for aggregated interconnector offtakes from the NTS so Users can better understand and assess system demand as a whole.

Given the importance of this information to the market we would ask that NGG and its system provider think how it can best support a low cost system solution to publish interconnector offtake data without delay. This may mean not being unduly constrained by system release dates or existing practices or demarcation with regard to the management of offtake as opposed to delivery data.”

#### **Modification Proposal 0097A**

Alternative Proposal 0097A was as follows:

*“Where capitalised words and phrases are used within this Modification Proposal, those words and phrases shall usually have the meaning given within the Uniform Network Code (unless they are otherwise defined in this Modification Report). Key UNC defined terms used in this Modification Proposal are highlighted by an asterisk (\*) when first used. This Modification Proposal, as with all Modification Proposals, should be read in conjunction with the prevailing UNC.*

UNC 0097 “Modification to release aggregated ex-post information for pipeline interconnector offtake flows” has been raised by E.ON requiring the publication of the previous days aggregated offtake flows for each pipeline interconnector to be published on both the Gemini system and National Grid’s website.

National Grid NTS, as an alternative, proposes that the previous day’s net physical offtake flow for each pipeline interconnector at 11:00 on D+1 be published on National Grid’s website only.

National Grid NTS recognises the importance of the disclosure of this information to the market. By publishing the information on the National Grid’s website it will ensure that all interested parties will have access to the information at the same time and in the same location.

In addition National Grid NTS consider that the systems modification work required in order to amend both our website system and Gemini would be an inefficient and unnecessary investment. This alternate Proposal involving modifications to the website

systems only therefore represents a more economic and efficient solution to achieve the same aim of Modification Proposal 97.”

**2. Extent to which implementation of the proposed modification would better facilitate the relevant objectives**

The following reasons why implementation of these Proposals would or would not better facilitate the achievement of the relevant objectives were put forward:

**A11.1 (a) the efficient and economical operation of the pipe-line system**

**Proposal 0097**

The Proposer of Proposal 0097 believed that implementation would facilitate the achievement of this objective “through providing shippers with the appropriate level of information to enable them to better forecast demand and thus make the appropriate trading decisions to balance their portfolio, with associated physical actions, resulting in improved balance of the system as a whole.” The Proposer reiterated this point in its response.

EDFE referred to the achievement of this objective in its belief that *“implementation of this modification would release additional information to the market. This would enable Shippers to better forecast demand, and thus take the appropriate trading decisions to ensure that their portfolio was balanced. This would result in an improved balance on the system as a whole, and so reduce the residual balancing actions required of National Grid.”*

SGN pointed out that it *“is not clear that the added benefit of providing information through Gemini under Modification Proposal 0097 justifies additional expense or would significantly improve efficiency. Indeed we would agree with the Proposer of 0097A, that such additional expense and duplication could be seen as inefficient.”*

**Alternative Proposal 0097A**

The Proposer of Alternative Proposal 0097A believed its implementation would “enable Users of the system to improve their forecast demand and this would be reflected in improving the balance of the system. By publishing on only the website and not duplicating, this will reduce implementation and maintenance costs and therefore improve efficient operation over that of Modification 97.”

EDFE acknowledged that implementation of 0097A would facilitate the achievement of this objective for the reasons it gave in respect of 0097.

EON commented that *“publishing data on the website alone, does not provide shipper / suppliers with what we deem to an appropriate level of, and platform for, information to enable them to better forecast demand and thus make the appropriate trading decisions to balance their portfolio.”*

GdF, whilst supporting implementation of both Proposals, expressed the view that the *“additional costs associated with 0097 make 0097a more efficient and economic than the original proposal and therefore this is our preferred option.”*

NGNTS considered that *“the systems modification work required in order to amend both our website system and Gemini (as would be required by UNC 0097) would be an*

*inefficient and unnecessary investment. The alternate Proposal, UNC 0097a, involving modifications to the website systems only therefore represents a more economic and efficient solution to achieve the same aim.”*

NGUKD commented on the best location for publication and believed *“the least cost solution using the most accessible, public location best facilitates SS Condition 11, and therefore, our preference is that the information is published on the Daily Summary Report on NTS’s website; that is, the solution proposed by National Grid NTS (Proposal 97a).”*

RWE supported both Proposals but on balance believed that this Proposal was *“the simpler and quicker to implement and will therefore better serve to facilitate the relevant objectives.”*

SGN believed that by *“publishing information on the NG website this will ensure information is made available to the widest possible group of interested parties. Information would be completely transparent and easily accessible to all. Information provided through Gemini, will only be accessible to a limited group of interested parties. By ensuring information is accessible to customers, we believe there is added potential for appropriate demand side response which could further improve efficiency of the system and the balance of the system.”*

SSE, whilst acknowledging that implementation of either Proposal would facilitate achievement of this objective, believed that this Proposal 0097A would do so *“in a more cost effective way”*

### **Both Proposals**

SGN believed that implementation of either Proposal would facilitate achievement of this objective *“in so far as they will provide additional information to all Shippers, large customers and any other interested party which could enable them to better understand demand, market response to changes in demand and price movements. However SGN note that demand on the previous day is not always an indication of future demand. Such information is only of value in so far as it is interpreted appropriately by users, and could be misleading.”*

SSE believed that implementation of either Proposal would facilitate achievement of this objective *“by providing shippers with data to improve demand forecasting. This should facilitate appropriate trading decisions to improve the balance of the system.”*

### **A11.1 1(c) so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee’s obligations under this licence**

#### **Proposal 0097**

The Proposer of Proposal 0097 believed that implementation would facilitate the achievement of this objective *“with respect to security of supply through assisting shippers in better forecasting demand, enabling them to make more efficient purchasing decisions, consequently reducing price volatility and facilitating security of supply. The publication of further data on NGG’s website will assist customers in making their own assessments as to the overall balance between supply and UK demand taking into account any transit flows. This improved information transparency may enhance large customers’*

willingness to offer ‘demand side’ response under tight supply conditions, which in turn should improve security of supply and under extreme circumstances reduce the chance of emergency procedures being invoked.” The Proposer reiterated this point in its response.

The Workstream Report for Proposal 0097 stated that the “publication of further data on NGG’s website will assist customers in making their own assessments as to the overall balance between supply and UK demand taking into account any transit flows. This improved information transparency may enhance large customers’ willingness to offer ‘demand side’ response under tight supply conditions, which in turn should improve security of supply and under extreme circumstances reduce the chance of emergency procedures being invoked.”

### **Alternative Proposal 0097A**

The Proposer of Alternative Proposal 0097A believed that its implementation would facilitate the achievement of this objective by improving information transparency, which in turn would assist Users in forecasting demand and will be reflected in decisions relating to security of supply.

EON commented that the publication of *“further data on NGG’s website will assist customers in making their own assessments as to the overall balance between supply and UK demand taking into account any transit flows.”*

**A11.1 1(d) so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition: (i) between relevant shippers, (ii) between relevant suppliers...**

### **Proposal 0097**

The Proposer of Proposal 0097 believed that implementation would facilitate the achievement of these objectives by “providing a level playing field where all shipper / suppliers have the same information available to them, provided through an established, consistent and transparent basis.”

In addition to the comments made in its Proposal, EON pointed out that *“Shippers at the relevant exit points are believed to have access to information at present which is not available to all Users.”*

EDFE noted that implementation *“would ensure all Shippers, and Suppliers; have access to this information on a level playing field,”* and thereby facilitate achievement of this objective.

### **Alternative Proposal 0097A**

The Proposer of Alternative Proposal 0097A believed that its implementation would facilitate the achievement of this objective “through providing a level playing field regarding access to the information.”

EDFE acknowledged that implementation of 0097A would facilitate the achievement of this objective for the reasons it gave in respect of 0097 but believed that implementation of 0097 would *“facilitate this objective to a greater degree as it would also encourage competition between Suppliers, by making the Gemini Meter List available on the public website.”*

The SME would like to reference a note of clarification that EON issued to all UNC Panel members with regard to their Modification Proposal 0097. In this note EON state that on *“the Gemini system shippers only see offtake meter data on the Gemini Meter Energy List that they supply. It was not the intention of E.ON UK to ask National Grid to publish the whole of the Gemini Meter Energy list but simply the D+1 deliveries at entry points plus the interconnector export offtake flows that form part of the Gemini Meter Energy List.*

*We agree that the wording of version 2 of modification UNC0097 could have been clearer. Nevertheless we believe that the legal drafting included in the draft modification report reflects our intent. Given the subject matter of the modification is clearly related to “interconnector offtake flows“ and modification consultees have generally interpreted the modification proposal in this way we hope the Panel is comfortable in making a recommendation on the basis of this legal drafting.”*

EON recognised that implementation would *“contribute towards a level playing field where all shipper / suppliers have the same information available to them. The Gemini system would, however, be a more equitable solution for the shipper / supplier community where used in conjunction with the website.”*

### **Both Proposals**

SSE believed that implementation of either Proposal would facilitate achievement of this objective *“by ensuring that all Shippers & Suppliers have access to the same information in a consistent and transparent basis at the same time.”*

NGUKD stated that they support *“the disclosure of information held by the System Operator to market participants where the information is aggregate, anonymous and does not reveal the commercial activities or position of individual companies. Additionally, the information should be capable of being disseminated efficiently and comprehensively. Where these conditions are met we believe the relevant objectives, detailed in a Gas Transporter’s Licence, Standard Special Condition A11.1, specifically sub-conditions (d) and (f), would be furthered. Against this yardstick, we believe that both Modifications Proposals 97 and 97a seek to publish information which could be relevant to the market and of interest to participants. We do not believe there is any confidentiality issues surrounding the publication of this information since similar information is already available at other locations on the internet. For convenience, it would seem reasonable that this aggregate information relating to the operation of the system is published by NTS in a location that is readily accessible and on the same website as other aggregate System Operator information.”*

### **3. The implications of implementing the Modification Proposal on security of supply, operation of the Total System and industry fragmentation**

The Proposer of Proposal 0097 suggested that "publicising aggregated interconnector flows after the day will provide Users with the appropriate level of information to forecast demand more accurately and as a result, reduce price volatility through enabling the market to better understand price movements, building confidence and facilitating security of supply."

The Proposer of Alternative Proposal 0097A suggested that its implementation “would enable Users to ascertain what proportion of demand is being exported through the interconnectors which will be utilised in forecasting demand.”

**4. The implications for Transporters and each Transporter of implementing the Modification Proposal, including**

**a) implications for operation of the System:**

The Workstream Report for Proposal 0097 stated that the “requirement for Residual System Balancing by the System Operator might be reduced if Users were able to balance their portfolios more accurately.”

The Proposer of Alternative Proposal 0097A stated that the Proposal would “not effect the operation of the system”.

**b) development and capital cost and operating cost implications:**

The Workstream Report for Proposal 0097 stated that it “is anticipated that the direct costs associated with the publication of one additional data item per day would be small. Indirectly, any reduction in the requirements for Residual System Balancing on tight demand days might be expected to reduce SO costs.”

NGNTS estimated systems costs of £128,000 and £100,000 for Proposals 0097 and 0097A respectively.

**c) extent to which it is appropriate to recover the costs, and proposal for the most appropriate way to recover the costs:**

The Proposer of Alternative Proposal 0097A suggested, in respect of that Proposal, costs would be “recovered as part of National Grid NTS system operator cost.”

**d) analysis of the consequences (if any) this proposal would have on price regulation:**

No such consequences were identified in either of the Proposals.

**5. The consequence of implementing the Modification Proposal on the level of contractual risk of each Transporter under the Code as modified by the Modification Proposal**

No such consequences were identified in either of the Proposals. However, the Workstream Report for Modification Proposal 0097 stated that “National Grid NTS would need to ensure that it had procured any necessary rights (if required beyond implementation of the Proposal) for the proposed additional information release.”

**6. The high level indication of the areas of the UK Link System likely to be affected, together with the development implications and other implications for the UK Link Systems and related computer systems of each Transporter and Users**

**Proposal 0097**

The Workstream Report for Modification Proposal 0097 stated that “The Proposer has suggested a minor change to an existing part of Gemini, which is part of the UK Link System.”

BGT stated its preference for this Proposal 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.”*

NGNTS stated that *“the systems costs associated with the implementation of the Proposals are currently estimated to be £100,000 for 0097a compared to £128,000 for 0097. These costs are based on the understanding of the Proposal detailed above i.e. that only interconnector data is to be published on the NGG website.”*

### **Alternative Proposal 0097A**

The Proposer of Alternative Proposal 0097A stated, in respect of that Proposal, no impact on the UK Link System would be anticipated.

EON commented that with regard to implementing Modification Proposal 0097, in their view *“any change required to Gemini would be relatively minor and would involve amending an existing part of the system (Gemini Meter Energy List). Overall historical 'demand' is already shown on the Daily Summary Report and interconnector exports could be represented in a similar way.”*

## **7. The implications of implementing the Modification Proposal for Users, including administrative and operational costs and level of contractual risk**

Both Proposers have identified that by publishing the information, Users should be able to forecast demand more accurately.

BGT, after pointing out that the main impact would be with respect to the Moffat interconnector data, recognised 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.”* BGT also pointed out that *“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,”* It therefore believed that *“this fact adds significant merit to this proposal.”*

### **Proposal 0097**

EDFE noted a benefit of this Proposal that implementation would maintain *“the Gemini system as an interface for shippers. If the information were only to be published on the public website for certain meter reads, and not on the Gemini system, then shippers would be faced with the same information dispersed across numerous platforms, rather than available from one source.”*

STUK referred to the *“substantial forecasting sensitivities surrounding demand through the Irish interconnector, as stated in Proposal 097,”* and believed there was *“a specific benefit, related to both proposals, associated with publishing ex-post data for aggregated interconnector offtakes from the NTS so Users can better understand and assess system demand as a whole.”*

STUK considered that *“this information is of particular value to shippers, when it posted on the Gemini Meter Energy List as it enables Users to view like for like information in one location and easily download such data into their risk management and forecasting systems. For this reason, we support Proposal 097 over and above Proposal 097A.”*



### **Alternative Proposal 0097A**

NGNTS pointed out that by *“publishing the interconnector offtake flow information on the National Grid’s website it will ensure that all interested parties will have equal access to the information at the same time and in the same location.”*

#### **8. The implications of implementing the Modification Proposal for Terminal Operators, Consumers, Connected System Operators, Suppliers, producers and, any Non Code Party**

No such implications were identified in either of the Proposals. However the Workstream Report for Modification Proposal 0097 stated that “Parties involved in the export of gas from GB through interconnectors would need to consider the need to change their arrangements with their customers in order to facilitate compliance with the UNC. Representations on this issue from the parties concerned would be particularly welcome, but Transmission Workstream attendees suggested that Modification 0006 provided a model which could be followed.”

BGT, after highlighting European differences in market transparency, stated that its support for this Proposal hinged *“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.”*

#### **9. Consequences on the legislative and regulatory obligations and contractual relationships of each Transporter and each User and Non Code Party of implementing the Modification Proposal**

No such consequences were identified in either of the Proposals. However the Workstream Report for Modification Proposal 0097 stated that “some consequences on these contractual relationships are anticipated in order that the information may be provided to National Grid NTS for release to Users.”

#### **10. Analysis of any advantages or disadvantages of implementation of the Modification Proposal**

The Workstream Report for Modification Proposal 0097 noted the following advantages and disadvantages:

Advantages:

- Improved information available to Users to balance their portfolios, thereby facilitating improved system balancing and security of supply
- Creates level playing field for Users in terms of information availability
- Reduced costs for Users in collecting data

Disadvantages:

- Increases Transporter costs

EON included the following points in their response in *“support of Mod 0097 and to counter the proposal made in 0097a....”*

1. *Gemini provides an Industry-standard template which better facilitates the download of Offtake flows into risk management and forecasting systems.*
2. *As a result, shipper / suppliers would face fewer problems with processing the data.*
3. *Availability of critical daily data is not subject to NGG website function.*
4. *Gemini provides an enduring solution and the new functionality could be easily transferred to any successor to the Gemini system as part of an overall system migration.*
5. *Historical data will more easily be stored and accessed by shipper / suppliers on Gemini. There is clearly a limit to which a website can hold masses of data and archiving would therefore be required. Publication on the website alone could, therefore, constrain availability of useful historical data."*

The Proposer of Alternative Proposal 0097A suggested the following advantages:

- "Provide Users and other interested parties, with the information which will be utilised to forecast demand more accurately.
- Reduce price volatility through enabling the market to understand price movements.
- Increase Users ability to assess the system as a whole in order to make appropriate purchasing decisions."
- "Implementation of the alternate modification will cost less than Modification Proposal 097."

The Proposer of Alternative Proposal 0097A suggested the following disadvantage

- "Requires investment to modify website system, however this investment will be considerably less than that required in order to implement Modification Proposal 097."

**11. Summary of representations received (to the extent that the import of those representations are not reflected elsewhere in the Modification Report)**

Representations were received from the following:

<b>Respondent</b>	<b>Abbr</b>	<b>0097</b>	<b>0097A</b>	<b>Preference</b>
Bord Gais Energy Supply	BGES	Not in Support	No response	N/A
British Gas Trading Limited	BGT	Qualified Support	Qualified Support	0097
Chemical Industries Association	CIA	Comments	Support	0097A
EDF Energy plc	EDF	Support	Not in Support	N/A
E.ON UK plc	EON	Support	Not in Support	N/A
Gaz de France ESS (UK) Ltd	GdF	Qualified Support	Support	0097A
National Grid Gas plc (UK Distribution)	NGUKD	Not in Support	Support	N/A

National Grid NTS	NGNTS	Not in Support	Support	N/A
RWE Npower plc	RWE	Support	Support	0097A
Scotia Gas Networks plc	SGN	Not in Support	Support	N/A
Scottish and Southern Energy plc	SSE	Not in Support	Support	N/A
Statoil (U.K.) Limited	STUK	Support	Support	0097

The responses can be summarised as follows:

Modification Proposal 0097:	Modification Proposal 0097A
4 support	8 support
2 qualified support	1 qualified support
5 not in support	2 not in support
1 comments	

Of the five respondents who gave support or qualified support to both Proposals, two expressed a preference for 0097 and three for 0097A.

Comments were made in respect of the following aspects of the Proposals

### **Information Transparency**

In commenting on Proposal 0097, BGES referred to the fact that the Moffat Interconnector is classified as a VLDMC Supply Point and expressed the opinion that the degree of transparency suggested should be applied to all VLDMC points on an “*all or nothing basis*”. It did not support “*application to particular VLDMCS’ in isolation*” and concluded that it did not see “*any tangible benefits from this modification proposal for Moffat only...*”

### **Interpretation of Proposal**

NGNTS pointed out that the wording of Proposal 0097 “*has potential to be interpreted in two ways. With regard to the publication of data on the NGG website it can be read to mean that just the interconnector flows are to be published or the entire Gemini Meter Energy List. The latter interpretation involves all the daily metered supply points totalling several hundred pages of data. This data is not referenced anywhere else in the proposal document. In producing the legal text, our lawyers have interpreted the intention of the proposal to include publication of the interconnector data only. This interpretation and the legal text has been agreed with the Proposer.*” NGNTS also referred to the fact that the Proposer had confirmed this intent within a Transmission Workstream.

The SME notes that the Proposer of 0097 also confirmed this interpretation in a note of clarification issued to all UNC Panel members on November 7th.

### **12. The extent to which the implementation is required to enable each Transporter to facilitate compliance with safety or other legislation**

No such requirements were identified in either of the Proposals.

### **13. The extent to which the implementation is required having regard to any proposed change in the methodology established under paragraph 5 of Condition A4 or the**

**statement furnished by each Transporter under paragraph 1 of Condition 4 of the Transporter's Licence**

No such requirements were identified in either of the Proposals.

**14. Program for works required as a consequence of implementing the Modification Proposal**

In respect of both Proposals, the Transporters would need to implement website changes. In respect of Proposal 0097 additional changes would be required to UK Link, which would be subjected to UK Link governance.

**15. Proposed implementation timetable (including timetable for any necessary information systems changes)**

SGN noted that parties “involved in the export of gas through interconnectors have indicated there could need to amend contractual arrangements with customers. Whilst the Proposer of 0097 is keen that arrangements should be implemented this winter, we believe the implementation date should fully take account of timescales required to resolve system and contractual issues to ensure compliance....”

**Proposal 0097**

Whilst the Proposer of Proposal 0097 has not put forward a specific implementation timetable, they suggest that “publication on the website should not be delayed by any system development work reasonably deemed to be necessary for implementation of the ‘Gemini solution’. If necessary the publication of interconnector offtake data on the NGG website should be implemented first preferably in early Winter 06/07. Implementation of the Gemini solution would then follow as soon as is reasonably practicable.”

EDFE supported this “*approach to implementation, to ensure that this information is available through at least one source as soon as possible and hopefully in time for this winter. We concur with the Proposer that this information is sufficiently important that all possible actions are taken to ensure that this information is available to the market this winter.*”

NGUKD did not concur that “*publication on the NTS’s website could be implemented as “Stage 1” with publication on Gemini to follow. This sequence of events would not accord with our view that the publication of this information should be done with economic efficiency.*”

**Alternative Proposal 0097A**

The Proposer of Alternative Proposal 0097A believed that Proposal 0097A “should be considered in parallel to UNC 097.”

The SME notes that in respect of Proposal 0097 a later implementation date could be anticipated due to the UK Link requirement. The UNC requires notice to be given of proposed UK Link changes. If the change request was presented to the November UK Link Committee meeting, this would be the latest date for including the change in the June 2007 release, unless the Committee decided to use its discretion.

**16. Implications of implementing this Modification Proposal upon existing Code Standards of Service**

No such implications have been identified for either Proposal.

**17. Recommendation regarding implementation of this Modification Proposal and the number of votes of the Modification Panel**

At the Modification Panel meeting held on 21 December 2006, of the 9 Voting Members present, capable of casting 10 votes, 9 votes were cast in favour of implementing Modification Proposal 0097. Therefore, the Panel recommended implementation of Modification Proposal 0097. At the same meeting, 10 votes were cast in favour of implementing Alternative Proposal 0097A. Therefore, the Panel recommended implementation of Alternative Proposal 0097A.

The Panel then proceeded to vote on which of the two Proposals would be expected to better facilitate achievement of the Relevant Objectives. Of the 10 Voting Members present, capable of casting 10 votes, 2 votes were cast in favour of implementing Proposal 0097 in preference to Alternative Proposal 0097A, and 8 votes were cast in favour of implementing the Alternative Proposal 0097A in preference to Modification Proposal 0097. Therefore, the Panel determined that, of the two Proposals, Alternative Proposal 0097A would better facilitate the achievement of the Relevant Objectives.

**18. Transporter's Proposal**

This Modification Report contains the Transporter's proposal not to modify the Code in respect of the original Modification Proposals but to modify the Code in respect of the alternative Proposal. The Transporter now seeks agreement from the Gas and Electricity Markets Authority in accordance with this report.

19. Text

**UNIFORM NETWORK CODE - TRANSPORTATION PRINCIPAL DOCUMENT  
SECTION V – GENERAL**

*Amend Annex V-1 by adding the following at the end of the table:*

<b>Data</b>	<b>Timing</b>	<b>Format</b>	<b>Presentation</b>	<b>Disclosure</b>
The aggregate physical quantity of gas offtaken from the System in the Preceding Gas Flow Day at the Connected System Exit Point in respect of each pipeline interconnector by which gas is transported to another country	By 11:00 hours on each Day	Tabular	Viewable	Public

Signed for and on behalf of Relevant Gas Transporters:

**Tim Davis**  
**Chief Executive, Joint Office of Gas Transporters**

Signature:

Date :