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Dear Julian,

UNC Modification Proposals 0097 & 0097a: “Modification to release aggregated ex-post information for pipeline interconnector offtake flows”

Thank you for your invitation seeking representations with respect to the above Modification Proposals.

National Grid Gas plc (UK Distribution), (“Distribution”), would like to offer support for Modification Proposal 97a and, consequently, believes that Modification Proposal 97 should not be implemented.

In general, Distribution supports 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.

We do not concur with the Proposer’s view (Draft Modification Report, Section 15) 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.

In terms of which is the best location for publication, we believe 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).

Yours sincerely,

Phil Lawton.