

- EIUG requests access to:
 - (i) linepack data at the same time as they are published on AT link;
 - (ii) Interconnector nominations / flows at the same time as they are made available to Interconnector customers.
 - (iii) Information on offshore issues at the same time as it is made available to producer consortiums.

- EIUG notes that there are technical issues which result in a time delay. Market participants rely on the information published by Transco – we ask that Transco is incentivised to ensure that the appropriate data is published on time. Files are date and time stamped once they are uploaded, so it is simple to monitor Transco’s performance.

- Delivery of data is not a trivial issue – it is a very important issue to our members as it affects their ability to operate efficiently in the gas market.

- EIUG welcomes the publication of near real time data and request that instantaneous flow rates be published per sub terminal (as stated in the energywatch modification).

- At the moment, EIUG believes that our members are being harmed commercially from a lack of market transparency – we ask Ofgem and DTI to recognise this issue. Market arrangements which benefit producers commercially tend to harm other market participants, including consumers.

- DTI cite the TISC, “the advantages of receiving information from all major parties, albeit on a voluntary basis, outweigh any benefit from imposing any element of compulsion.” EIUG notes that Ofgem cite the opposite case from a response in their impact assessment - precisely because the information is voluntary, it is of less relevance/use to the market.

- EIUG believes that field reliability forecasts are crucial in driving forward prices – we request more detailed information on these is made available to customers.

- The industry voluntary agreement on information provision will deliver to the market aggregated data (two zones) on near to real-time gas flows into the NTS. EIUG welcomes this initiative, but requests that the energywatch modification is approved, as disaggregated information is also required by the market.

- EIUG will be responding to the impact assessment on modification 727 – we would like to see DTI’s response.

- EIUG recognises that the gas and electricity markets are different. We believe that increasing market transparency will aid competition. We would also point out that there are some universal principles that are characteristic of all functional markets – access to data is one of them.
- We request that the commercial concerns of information receivers, as well as those of producers, are taken into account. It is also “appropriate” to consider the asymmetries of information both vertically and horizontally along the supply chain. Producers have a very good idea of what competing gas producers are making available.
- The website: www.bmreports.com has a similar functionality for the electricity market – this site is updated every 30 minutes and is stable to automatic downloads. We look forward to the upgrade of the current system for the gas market.
- Transco has sent around a customer feedback questionnaire – we will be working with Transco on the issues of definitions and structure of the website.