Julian Majdanski
Modification Panel Secretary
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
Solihull
B91 3QJ

10th August 2005

Dear Julian,

Modification Proposal 005: 'Provision of a Guarantee of Pressure for Meter Points operating above 21 mbar by the Relevant Transporter'

Thank you for the opportunity to comment on this modification proposal. Statoil (UK) Ltd. (STUK) would like to make the following comments.

STUK supports this modification proposal which seeks to place an obligation on the relevant Transporter to agree to provide pressures in excess of 21mbar, (providing this can be physically supported under normal operating conditions).

The offer of a 'Guarantee of Pressure' would be of interest to end consumers, as significant drops in pressure disrupt the efficient running of a site, and increase the risk of a loss of production capability. STUKs interpretation of a 'Guarantee of Pressure' is of a permanent guarantee and not for a limited period, this service would enable end consumers to plan future long-term investments with greater certainty.

As services become more unbundled, shippers and suppliers should be allowed the same level of service from all Transporters. Unbundling should encourage competition and not lead to deterioration in the service offerings from service providers. This proposal would mean equal treatment of all sites with regard to pressure, creating a level playing field.

STUK trust that our comments will be given due consideration, and should you wish to discuss any aspect of this response further, please contact me on the above number.

Yours sincerely

Shelley Jones
Regulatory Affairs Advisor

* Please note that due to electronic transfer this letter has not been signed