

Representation For. 0735
"Amendment to the minimum notice required for UK Link changes"
Version 1.0

Date of Communication: 01/02/2005
External Contact: Sam Parmar (Statoil (U.K) Ltd.)
Slant: Against
Strictly Confidential: No

Abstract

Julian Majdanski
Modification Panel Secretary
Contract Compliance & Development
Transco
Floor D3 NGT House
Warwick Technology Park
Warwick
West Midlands CV34 6DA

31st January 2005

Dear Julian,

Modification Proposal 735: "Amendment to the minimum notice required for UK Link changes"

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

STUK do not support this modification proposal. This is because we do not consider it appropriate or in the best interests of all shippers concerned to have UK Link changes restricted to three defined periods within a year. Not all shippers are signatories of SPAA or have activities in the retail electricity market, and therefore the volumes of related changes are not equal across all shippers. STUK therefore do not consider it appropriate to support changes which do not benefit across the entire industry.

Having three pre-determined scheduled releases restricts shippers and Transco in implementing changes outside the release window and this can cause unnecessary delays (e.g. if the release window has just closed) with additional costs being incurred through the provision of IT resources (e.g. due to longer

lead times). STUK believe that the implementation of this proposal would remove the flexibility from both shippers and Transco and prevent them from being able to make changes to systems throughout the year.

While we can appreciate that there are benefits to be gained from bundled releases and would appeal to Transco to attempt this where feasible we do not believe that the restrictions imposed by a formal modification are appropriate.

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

Sam Parmar
Regulatory Affairs Advisor

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