

**Eni UK**

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NSGP/LET/PS/ys/.../05

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

Dear Mr Majdanski

**Response to Urgent Modification Proposal 0043 “Limitation on offering for sale unsold capacity”**

In this letter, Eni UK Limited (“Eni”) have set out its views in response to Transco NTS’s Urgent Modification Proposal 0043 “Limitation on offering for sale unsold capacity”.

It is our understanding that Transco NTS seek to modify the Uniform Network Code (“UNC”), by removing the obligation placed on Transco NTS to make Unsold NTS Entry Capacity (“unsold capacity”) available to Users at an Aggregate System Entry Point (“ASEP”).

Although Eni welcomes the fact that Transco NTS has withdrawn its original modification proposal 0037 and replaced it with a revised version, “modification 0043”, Eni still finds this modification to be unacceptable as it still lacks sufficient detailed information.

The revised modification (0043) partly addresses the issue of relying solely on Transco NTS’s discretion to withhold unsold capacity by the additional step of requesting permission from the Authority. However, no detail has been provided of how this request process will be carried out, e.g., timescale for responses. Furthermore, the issue of whether a request for permission to withhold unsold capacity is an obligation upon Transco NGT or optional, is unclear.

Eni has previously stated in its response letter to the consultation on modification proposal 0037, that we believe Transco NTS should provide detailed reasoning with a full cost-benefit analysis why they believe Users may face “potentially high buy-back costs”. Eni believe this issue has still not been addressed.

In summary, Eni believe that the current modification is unacceptable because it does not provide a detailed cost-benefit analysis for its implementation and because the Authority request process for withholding any unsold capacity has not been fully defined.

In summary, Eni believe that the current modification is unacceptable because it does not provide a detailed cost-benefit analysis for its implementation and because the Authority request process for withholding any unsold capacity has not been fully defined.

We hope our comments will be given due consideration before a final decision is made with regards to the implementation of this proposal.

Yours sincerely,



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