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Tim Davis  
Joint Office of Gas Transporters  
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51 Homer Road  
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Monday 11 September 2006

Dear Tim

**RE: UNC Modification Proposal 0100 Amendment to OPN / SFN Submission Times**

Whilst Statoil U.K. supports the concept of improving the delivery of market information, we do not believe that this proposal would achieve this and would, in fact, lead to a degradation of market information. It is for this reason that we do not support this proposal.

It is important to balance the risk of providing more timely information against the accuracy of the information given. With respect to the amendment to OPN / SFN submission times, providing information at an earlier stage in the process would lead to the submission of inaccurate information, which has the potential to mislead the market, and, therefore, impede the efficient and economic operation of the pipeline system.

The Transporter's demand forecast, based on earlier submission times, would be unreliable and may send out the wrong signals to Users, thwarting the market's ability to plan its actions for the forthcoming day, in response to that forecast and reducing market confidence.

It is also our understanding that there are clear operational and cost impediments to implementation of this proposal, with particular reference to storage sites and interconnectors. The proposal would require changes to a host of other User Agreements and contracts with customers, which we do not envisage could be achieved in time for this winter.

Please do not hesitate to contact me if you wish to discuss any of the above.

Yours sincerely,

Christiane Sykes  
Regulatory Affairs Manager.



ISO 14001 Certificate 156



ISO 9002 Certificate No. 34477