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Mr. Julian Majdanski
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02 February 2006

Dear Julian,

Re: Modification Proposal 0121: The Provision of Ex-Post Demand Information for all NTS Offtakes

Thank you for the opportunity to comment on the above modification proposal. Statoil (UK) Ltd (STUK) is not in support of this modification and would like to make the following comments.

Whilst understanding the request for more transparency in the offtake information available to the industry, STUK have concerns that the publication of ex-post demand data in an un-aggregated form could lead to undue discrimination between offtakes, especially between industrial loads connected to the NTS and those of a similar size connected to a DN.

Although STUK accept that the proposer has made a great effort to seek the views of the industry on this issue it still believes that the unaggregated publication of data could lead to a competitive advantage being gained by industrial sites connected to a DN. Industrial loads on a DN would have access to the offtakes of NTS sites of a similar size and commercial nature and would therefore be able to use this data to potentially forecast a site's production rates. Sites on the NTS would be blind to the offtakes of their DN connected competitors and therefore would not be able to perform the same type of analysis of their offtake data.

STUK believes that the perceived benefits of the proposal with regard to security of supply and improved forecasting could still be gained if the ex-post demand data from the NTS was published in aggregated format and that no real benefit is gained from the level of



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granularity suggested. If the publication of ex-post demand data at site level is preferred STUK believes that the risk of undue discrimination could out way any potential benefits.

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 Rouse
Statoil (UK) Ltd

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



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