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12 January 2006

Dear Julian,

Re: Modification Proposal 0130: The Provision of Ex-Post Demand Information for NTS Offtakes

Thank you for the opportunity to comment on the above modification proposal. Statoil (UK) Ltd (STUK) is in support of this modification and would like to make the following comments.

In its response to modification proposal 0121: The Provision of Ex-Post Demand Information from NTS Offtakes, STUK highlighted the concerns it had with the publication of offtake data in an unaggregated form and the potential impact it could have on customers directly connected to the NTS, compared to those on the DN.

STUK supports the use of aggregated data wherever possible, to prevent potentially commercially confidential information being released to the wider market and, therefore, supports the implementation of modification proposal 0130, believing that it would bring the benefits associated with proposal 0121 but, remove the risks associated with it.

By publishing aggregated offtake data from NTS offtakes on the National Grid website, the benefits of transparency can be gained without the risk of companies not connected to the NTS gaining a commercial advantage over those that would be subject to full offtake disclosure under modification 0121.

STUK agrees with the Proposer that aggregation of data gives sufficient transparency, without unfairly revealing the trading positions of customers. STUK continues to believe that the publication of non-aggregated data, in particular, when published on a real-time basis,



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whether at entry or at exit, risks influencing market pricing and behaviour; as noted by the Proposer in their presentation to the Transmission Workstream, with respect to reasons for aggregating data after the day.

Furthermore, we agree that the publication of non-aggregated data might lead to the availability of commercially confidential information, as suggested by the Proposer. We continue to believe that this remains a key concern, whether it relates to gas entering the system or gas offtaking the system.

STUK, therefore, supports the proposer's suggestion that this modification better facilitates the relevant objective A11.1 (a) the efficient and economic operation of the pipeline system, by providing all shippers with the appropriate level of information to enable them to forecast demand and therefore better balance their portfolios.

STUK trusts 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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