

Mr Julian Majdanski
Joint Office of Gas Transporters
Ground Floor Red
51 Homer Road
Solihull
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May 24th 2007

UNC Modification Proposals 150- 151- 150A-151A

Trades and Transfers of Sold and Unsold Capacity

Dear Julian,

Total E&P UK Ltd. welcomes the opportunity to make a representation with regards to the above mentioned UNC Modification Proposals.

Whilst Total E&P supports the principle of trades and transfers within the NTS in order to make the most efficient use of the National Transmission System, we are unable to back any of the proposed UNC Modification Proposals at this stage. Having stated this, we find E.ON's proposal all the more worrying as it would create a fundamental change in the way entry capacity is secured by shippers in AMSEC and RMSEC auctions.

We believe that these modification proposals should be assessed within the framework of National Grid's Licence Obligation (which has not yet been concluded) and the relevant Methodology Statement (which is currently under consultation) and so we are not ready to support any modification at this stage.

We believe that the urgency driving the implementation of a process to transfer entry capacity has been increased by Ofgem's decision to significantly reduce the level of baseline capacity at certain entry points for this Price Control Period. None the less we believe that such a relevant change in the way entry capacity is managed deserves full consideration and the analysis of all commercial and operational consequences.

Total E&P support further work on this issue, and would welcome an Impact Assessment from Ofgem.

Yours Sincerely,

Bruno Seilhan
Commercial Operations Manager
Total E&P UK Ltd.

(This letter was sent electronically and therefore it has not been signed)

