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Dear Julian,

Modification Proposal 0196: Alterations to shipper penalties for end user failure to interrupt

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

Failure to interrupt is a serious issue and STUK fully supports the retention of the the current penalties for an individual supply point failure to interrupt, however it agrees with the proposer that that the current "5 strikes" rule (failure to interrupt 5 times in one year results in all Users interruptible supply points becoming firm) places a disproportionate level of risk on the User as they have little direct control over the interruption of a supply point.

By removing the "5 strikes" rule from sections TPD G 6.9.6, 6.9.7 and 6.9.8 of the UNC an unduly onerous risk would be removed from the shipper/supplier community. Security of supply would not be affected by this change to the code as the power for Transporters to isolate customers that threaten the safe operation of the system through continued failure to interrupt would remain.

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
UK Regulatory Affairs Advisor



ISO 14001 Certificate 156



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