

Julian Majdanski
Modification Panel Secretary
Joint Office of Gas Transporters
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20 May 2009

Dear Julian

Modification Proposal 0210: Implementation of DNPC03 (LDZ System Charges – Capacity/Commodity Split and Interruptible Discounts), the Alignment of Failure to Interrupt Charges and the Alignment of the IFA Charge

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

The implementation of this modification will allow the GDNs to amend their charging methodologies with effect from 1st October 2008, to introduce the change in the capacity/commodity split from 50:50 to 95:05. An unintended consequence of this change was its impact on the IFA and FTI charges.

STUK welcomes the proposed amendments to the calculation of the IFA and FTI charges to enable them to remain properly reflective with no inappropriate discounts or inappropriate FTI charges for interruptible sites, and to help ensure that there is no inappropriate discrimination between market sectors.

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
Statoil (UK) Ltd