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Julian Majdanski Secretary – UNC Modification Panel Joint Office of Gas Transporters 51 Homer Road Solihull West Midlands B91 3QJ

Dear Julian

MODIFICATION PROPOSAL 0212 - REVISION OF ROUGH STORAGE CONNECTION AGREEMENT

Nexen Energy Marketing London Limited (Nexen) welcomes the opportunity to comment on the above urgent modification proposal. We **fully support** the implementation of the proposal.

Nexen believe it is appropriate to amend the Rough Storage Connection Agreement (SCA) to accommodate the increase in the injection offtake rate of the Rough storage facility, from 21mcm/d to 26 mcm/d. It is important that the commercial arrangements governing access rights reflect the physical capability of the network.

We would like to stress the importance of ensuring that this proposal is implemented as a matter of urgency. It is vital to ensure Rough Storage users are able to make full use of the increased physical capability of the facility over the summer injection period that has already begun. National Grid has also confirmed that the increase in the injection offtake rate to 26 mcm/d will not impose any operational difficulties and therefore can be utilised immediately.

We agree with the proposer that there is a genuine risk of significant commercial cost to the gas market if the additional injection capability is not made available to Rough customers. The additional firm injection rates released through this proposal will ensure Rough is filled in a timely manner, ahead of the winter, dampening volatility in winter prices. The proposal facilitates the efficient and economic operation of the pipe-line system.

Yours sincerely

Yehuda Cohen