

John Bradley
Modification Panel Secretary
Joint Office of Gas Transporters
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06 October 2008

Dear John

Modification Proposal 0218: Amendment to the base period used to define Seasonal Normal Weather

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

The current method of basing seasonal normal weather on purely historical data is becoming less accurate due to the recent changes in weather patterns. As seasonal normal is used to adjust AQs to allow them to be used as a proxy for future demand and is also used by Networks as the basis for long term planning it is vital that Transporters have the ability to incorporate data which increases the accuracy of the forecast into the seasonal normal weather calculations.

As such, STUK is in support of amending the UNC to allow seasonal normal weather to be set on a more appropriate basis. By allowing the use of an element of forecast data, to incorporate the accepted view that Global warming is changing weather patterns, into the seasonal normal weather rather than relying on historical data to form a representation of future weather patterns, the accuracy of AQs will increase, fundamentally improving the Transporters ability to operate the pipeline system in an efficient and economic manner.

STUK support the retention of the 5 year review period for the data used to forecast seasonal normal weather. This would allow a period of monitoring of the accuracy of the forecasts and then give an opportunity to revise the data as necessary.

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