

John Bradley
Modification Panel Secretary
Joint Office of Gas Transporters
Ground Floor Red
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13 October 2008

Dear John

Modification Proposal 0223: Provision of day ahead Gas Flow Nomination data at major Aggregated System Entry Points

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

Whilst supportive of the proposal, to provide Gas Flow nomination data D-1 to allow shippers the opportunity to adjust nominations to utilise unused capacity, STUK believes that the level of aggregation proposed does not allow shippers sufficient protection against exposure of their supply positions day ahead. STUK recognise and welcome the work that National Grid have already done in this area and accept that the current proposal is an improvement on the initial discussions at the Transmission Workstream, but concerns remain.

Although NG recognise that the capital cost of implementation of this modification will be minimised by including development within the MIPI phase 2 work the costs increase with the continuous change in requirements. These additional costs could be limited if the development of the proposal is delayed until the transparency project and GRI phase 1 work is completed and a final set of requirements is known.

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