

John Bradley  
Modification Panel Secretary  
Joint Office of Gas Transporters  
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13 January 2009

Dear John

## **Modification Proposals 0240: Promoting Competition in Operating Margins Provision**

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.

Revising the UNC to increase flexibility in the provision of Operating Margins and introducing the ability for National Grid to procure Operating Margins services from a wider range of sources may increase competition in the area of Operating Margins Provision, potentially decreasing the cost of OM procurement to the industry.

STUK supports the proposers view that implementation of this modification would better facilitate the achievement of the following relevant objectives:

Standard special condition A11 1(a), the efficient and economic operation of the pipeline  
Standard special condition A11 1(c), the efficient discharge of the licensee's obligations  
Standard special condition A11 1(d), the securing of effective competition.

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