

John Bradley  
Modification Panel Secretary  
Joint Office of Gas Transporters  
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11 September 2009

Dear John

## **Modification Proposals 0262: Treatment of Capacity affected by Force Majeure**

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

STUK welcome the proposal to remedy the current irregularity in the UNC where by National Grid are able to claim Force Majeure and still continue to charge customers for the capacity that they can no-longer use at both Entry and Exit.

This proposal seeks to rebate customers affected by an FM event, the weighted average price paid for capacity. This will in turn allows NG a mechanism to effect the capacity reduction that is required and to manage the varying levels of constraint during the FM event.

The implementation of this proposal will offer additional certainty and clarity to shippers over the process that will be used to constrain capacity and that they will receive some payment for capacity should an FM event occur.

STUK agree with the proposers views on the relevant objectives which would be better facilitated by the implementation of this proposal and have nothing further to add.

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