

Helen Cuin
Joint Office of Gas Transporters
Consort House
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Solihull B91 3QQ
Email: enquiries@gasgovernance.co.uk

Our Ref: BD/COM/AB/13-0047

11 July, 2013

Dear Ms. Cuin,

Subject: Initial Representation on UNC Modification 0461 - Changing the UNC Gas Day to Align with the Gas Day in EU Network Codes

In response to the proposed modification to the Uniform Network Code on changing the gas day to align with European Union network codes (#0461), Total E&P UK Ltd. would like to submit our initial representation. Total E&P UK opposes UNC Modification #0461. Total E&P UK finds that the aforementioned proposed modification presents significant technical changes, extensive contractual changes and associated costs, whilst not presenting clear benefits to business operations for producers/shippers nor to the British gas market as a whole.

First, Total E&P UK finds that as a producer, shipper and terminal operator, changing the gas day from 06:00-06:00 UTC to 05:00-05:00 UTC would present significant technical changes offshore and onshore. Offshore all metering, allocation, and data collection systems would need to be altered. This has varying associated costs as the technical capabilities of each software operating system are unique to each asset. To comply with the proposed changes, Total E&P UK would need to conduct a comprehensive audit of all software systems, and determine which systems would require upgrades to comply with the gas day change. To make these software system upgrades, Total E&P UK would incur high associated costs with no added technical facility. Onshore Total E&P UK would also need to alter all metering, allocation and data collection systems, whilst harmonising these systems with users exporting through TEPUK-operated infrastructure. The risk potential and costs associated with harmonising systems within and between companies is extensive.

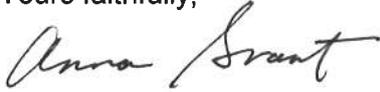
Second, Total E&P UK finds that all contractual agreements would need to be altered to reflect the change in the gas day. Total E&P UK would be obliged to audit all existing contracts and make appropriate alterations where there is mention of "gas day" or "06:00-06:00 UTC." Costs associated with making these contractual amendments would fall disproportionately on asset operators, such as Total E&P UK.

Third, UNC Modification 0461 lacks clarity, as the modification contains no specific legal text. Total E&P UK does not support this modification, given that it does not clearly define the obligations of operators and infrastructure users within the gas transportation system, aside from the obligation to change the definition of the gas day.



Total E&P UK recommends to the Joint Office of Gas Transporters to maintain the status quo, keeping the gas day defined as 06:00-06:00 UTC in the Uniform Network Code. This would not incur additional costs to producers, shippers or terminal operators.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Anna Grant', written in a cursive style.

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