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Julian Majdanski
Modification Panel Secretary
Joint Office of Gas Transporters
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6 January 2006

Dear Julian,

Modification Proposal 0054 "Emergency Curtailment Quantity (ECQ) Methodology Statement"

Thank you for the opportunity to comment on the above modification proposal. Statoil (UK) Ltd (STUK) is not in support of this proposal and would like to make the following comments.

STUK welcomes the efforts made by National Grid in proposal 0054 to define the ECQ Methodology Statement as an ancillary document to the code but, does not feel that the proposal goes far enough to give confidence to the industry that a full consultation process will be followed.

The proposal suggests that changes to the ECQ Methodology can only be made by the Transporters with Majority approval of the UNC Committee. STUK believe that in order for full industry exposure to be given to the changes to the ECQ Methodology they should follow the already established Modification governance process.

The proposal states that a consequence of not implementing 0054 would be that Transporters may use inconsistent methods of calculating the components of the ECQ. STUK would argue that this will not be the case as the methodology itself states that *'the relevant Transporter.....will select what it considers to be the most reasonable of the estimates or alternatively manually enter an alternate estimate'*. Implementation of this proposal will not offer any assurances to Users that the most appropriate method of calculation has been used for their ECQ.

The proposal also suggests that implementation would further the relevant objectives, specifically 1(a) *'the efficient and economic operation of the pipeline system by ensuring that all Transporters meet their UNC obligations in regard to the calculation of their components of the ECQ in a consistent manner and will improve the efficient operation of the ECQ process by increasing clarity'*. STUK believe that it is difficult to determine how this proposal will ensure the calculation of the ECQ components in a consistent manner as the current Methodology statement is open to very wide interpretation which is not affected by this proposal. Also the change process suggested does not offer any assurances that a full consultation period will be offered or suggest the time frames in which this will take place.



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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 Jones
Regulatory Affairs Advisor



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