

Representation For. 0053

"Extending established Uniform Network Code governance arrangements to include the Network Code Operations Reporting Manual referenced in Section V9.4"
Version 1.0

Date of Communication: 31/01/2006
External Contact: (Statoil (Uk) Gas Limited)
Slant: For
Strictly Confidential: No

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

A number of procedural documents to the UNC that describe how Transporters and Users action their UNC obligations are not subject to full industry governance arrangements.

This proposal builds on the principles established by the implementation of Modification 730 and proposes that UNC governance arrangements are extended to include the Network Code Operations Reporting Manual.

STUK agree that the Network Code Operations Reporting Manual would benefit from full joint industry governance so that all Transporters and Users can propose revisions, with changes only being made by either approval of the UNC committee or by following UNC modification procedures.

STUK agree that this would better facilitate the relevant objectives by improving transparency and accountability and facilitate better change management and competition between shippers and suppliers. STUK also believe that as this proposal would reduce the risks associated with insufficient visibility of the Network Code Operation Manual, it would further facilitate 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
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