

Statoil (U.K.) Limited Gas Division

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Mr. Julian Majdanski Joint Office of Gas Transporters Ground Floor Red 51 Homer Road Solihull West Midlands B91 3QJ enquiries@gasgovernance.com

2 November 2006

Dear Julian,

Re: Modification Proposal 0113: Availability of Unsecured Credit Based on User Payment Record or Independent Assessment

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.

The modification proposal recommends that a User without a credit rating allocated by Moodys or Standard & Poors or with a public rating that is below the current prescribed minimum be able to obtain unsecured credit by two alternative means, either by their payment record or by independent assessment.

STUK are in agreement with the proposer that implementation of this proposal would help to achieve a consistent credit process and better facilitate the achievement of the relevant objectives by ensuring that there are no inappropriate barriers to entry or inappropriate discrimination and would facilitate the securing of effective competition between relevant shippers.

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 faithfully

Shelley Rouse Statoil (UK) Ltd



