

John Bradley  
Modification Panel Secretary  
Joint Office of Gas Transporters  
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Dear John

**Modification Proposals 0243: Amendments to the process for initialisation of Enduring NTS Exit (Flat) Capacity at the Moffat NTS Exit Point**

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

By delaying the initialisation of enduring capacity volumes at the Moffat NTS exit point, until at the latest May 2011, allowing time for a mechanism, similar to the existing capacity certification methodology, to be established the linkage between the upstream and downstream capacity arrangements could be maintained.

The potential absence of a link between traded volumes and upstream and downstream capacity holdings could increase the complexity, risk and costs associated with gas trading at Moffat and impact the effective operation of the cross-border point.

STUK supports the views of the proposer with regard to the better facilitation of the relevant objectives and has 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