## **StatoilHydro**

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John Bradley Modification Panel Secretary Joint Office of Gas Transporters Ground Floor Red 31 Homer Road Solihull West Midlands B91 3QJ

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Dear John

## Modification Proposals 0265: Creation of an NTS Entry Capacity Retention Charge within the Uniform Network Code

Thank you for the opportunity to comment on the above modification proposal.

Although against the implementation of Entry Capacity Substitution and the currently proposed Methodology, Statoil (UK) Ltd (STUK), when considering this proposal on its own merits and against the relevant objectives, supports this proposal.

STUK believe that this modification in isolation, acts to facilitate the introduction of the 'Retention Charge' into the UNC and should the Entry Capacity Substitution Methodology not be accepted by Ofgem the retention charge would serve no other purpose.

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

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