

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