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Julian Majdanski
Modification Panel Secretary
Transco
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B91 3LT

4th January 2005

Dear Julian,

Modification Proposal 731: 'Specific Amendments to the Modification Rules'

Thank you for the opportunity to comment on the modification proposal. Statoil (UK) Ltd. (STUK) would like to make the following comments.

STUK support this modification proposal and believe that much progress has been made on the various issues raised by modification proposal 716 at the Governance Workstream meetings.

STUK support the amendments proposed to the Modification Rules as we believe this allows for a more balanced and neutral process which prevents Transco from establishing a dominant position. The changes being proposed will make the Network Code governance regime more equitable.

One of the main issues for STUK arising from this proposal is the need during the consultation stage for additional information from Transco about the likely systems impacts and the implementation timescales. Early indication of the likely system impacts would be helpful in determining the associated costs which would assist shippers in making informed decisions on various proposals. Whilst we recognise the fact that in some instances, due to time constraints or the lack of available information, it may not be possible for Transco to provide a definitive list of the likely system impacts, it would however, help the process if Transco could release indicative information during the Draft Modification Report stage.

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.

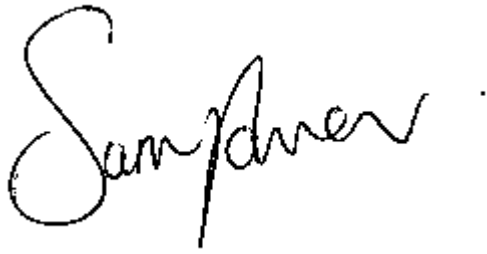


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Yours sincerely



Sam Parmar
Regulatory Affairs Advisor



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