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Gas Division**

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Robert Hull
Director, Transmission
Ofgem
9 Millbank
London
SW1P 3GE

20 February 2008

Dear Bob,

Re: Information request on the availability of NTS flexibility capacity

Whilst STUK welcomes the publication by Ofgem of NGGs analysis on the availability of NTS exit flexibility capacity, it feels that the two week consultation deadline does not offer enough time for industry participants to fully consider and address the complex and significant issues raised.

As such STUK would like to offer its support to the findings of the TPA report commissioned by the Gas Forum, in particular its concerns over the NG methodology for accessing available flexibility, the assumptions made by NGG regarding the changes to the GDN interruption arrangements and its impact on available flexibility and the impact of backloading at entry on NTS exit flexibility.

STUK also supports the suggested provision of further information, as highlighted in the TPA report, relating to supply impacts, revised interruption arrangements, GDN requirements and Back and Front loading, and agrees that it would be of great assistance to the industry in the understanding and assessment of the issues associated with NTS exit flexibility.

The NGG analysis along with TPAs findings and the publication of further information should be used as a starting point for further industry debate and STUK would welcome the opportunity to actively take part in further discussions relating to NTS exit flexibility whether as part of the 0116 processes or in a dedicated working group.

If you have any questions, please contact me on the above number.

Yours sincerely



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Shelley Rouse
UK Regulatory Affairs Advisor
Statoil (UK) Ltd

*Please note that due to electronic transfer this letter has not been signed.



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