

21 November 2014



Commission de Régulation de l'Energie  
Consultations publiques  
15, rue Pasquier  
75379 Paris Cedex 08

London, 21<sup>th</sup> November 2014

***RE. Statoil's response to the CRE public consultation on the TSOs transportation tariff as of the 1<sup>st</sup> of April 2015.***

Dear Sir, Dear Madam,

Statoil would like to thank CRE for the opportunity to respond to the public consultation on the evolution of the transportation tariffs from 1<sup>st</sup> April 2015.

This response is not confidential and can be published by CRE.

Should you wish to discuss any aspect of this response, please contact me.

Yours sincerely,

Nahed Cherfa

Best regards,

**Nahed Cherfa**

Governmental and Regulatory Affairs Adviser

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***Question 1: Are you in favour of CRE's proposal to apply a rate identical to the Fos and Montoir PITTMs to the Dunkirk PITTMs?***

Statoil is in favour of the proposal from CRE to apply a identical rate to Fos/Montoir and Dunkirk PITTMs.

***Question 2: Do you support CRE's proposals regarding the pricing of the Alveringem interconnection point?***

Statoil does not have any objections to the principles that CRE has applied to underline the proposal of the Alveringem interconnection point. Statoil awaits the implementation of a virtual interconnection point between Belgium and France as previously announced.

***Question 3: Are you in favour of CRE's proposal to introduce a more flexible capacity subscription mechanism for PITTMs?***

Statoil is in favour of introducing a more flexible capacity subscription mechanism at the PITTMs.

***Question 4: Are you in favour of the method proposed by CRE to set tariffs for GRTgaz and TIGF PITS?***

Statoil do not object to the methodology proposed by CRE.

***Question 5: Are you in favour of CRE's proposal, which concerns adding the income from monthly and daily capacity auctions and the differences between redistribution and the amount collected by the TSOs to the amounts to be repaid in the following year?***

***Question 6: Are you in favour of the CRE's proposal to renew, from 1 October 2015, the redistribution procedures for annual and quarterly capacities defined in its deliberation of 18 June 2014 and to extend the return to the PIR Jura?***

Statoil is in favour of the CRE's proposal to harmonize the redistribution procedures.

***Question 8: Are you in favour of UNIDEN's proposals concerning gas-intensive consumers?***

Statoil is opposed to the UNIDEN proposals as these are discriminatory measures that are not in line with the European energy market regulations.

As previously communicated, Statoil strongly believes in fair and equal treatment in the market and does not support subsidization mechanisms which to lead to distorted competition.

***Question 9: Are you in favour of a measure to extend the short-notice interruptible offer to shippers reserving more than 10 GWh/d as a counterpart to interruptibility linked to the availability of the North-South link?***

Statoil is in favour of introducing this temporary measure aiming at maximizing the North to South capacity link.

***Question 11: Do you consider that the quality of the quantities telemetered to delivery points of consumers connected to the transmission network and transmitted to shippers the following day is satisfactory for GRTgaz? For TIGF? Are you in favour of changing the corresponding indicator proposed by GRTgaz?***

***Question 12: Do you want an indicator that permits monitoring of the regular updating of the five most important information points published on SMART GRTgaz and Datagas to be created? If yes, what information should be monitored?***

Statoil would like to reserve its views until further detailed information is made available. The practicalities regarding the indicator's content and implementation should be discussed further in the Concertation Gaz workshops.

***Question 14: Are you in favour of the establishment of a financial incentive on the availability of firm and interruptible capacity to the North-South link?***

Statoil do not favour a financial incentive to reward additional firm and interruptible capacity in the North South link. It is indeed part of the TSOs mission to optimize the capacity availability in order to support the market and reduce physical congestions.

***Question 15: Are you in favour of the creation of an indicator to monitor the quality of the interventions of TSOs on the markets for balancing?***

Statoil would like to reserve its views until further detailed information is made available notably on the aim and content of such an indicator. Statoil is of the opinion that such an indicator should be discussed further in the Concertation Gaz workshops.