

Representation - Draft Modification Report 0595S

Amendment to the Arrangements between National Grid NTS and GNI at the Moffat IP to provide for Interruption of Virtual Reverse Flow

Responses invited by: **5pm on 10 November 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Andrew Kelly (Wholesale Development Manager)
Organisation:	Gas Networks Ireland
Date of Representation:	07/11/2016
Support or oppose implementation?	Support
Relevant Objective:	g) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

Gas Networks Ireland (GNI) agrees with the Workgroup conclusion that this modification would further relevant objective (g) - *Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators* as it demonstrates the continued co-operation between TSOs required under EC 715/2009. Furthermore, EC 984/2013, which established a network code on Capacity Allocation Mechanisms (CAM NC), specifically Article 21(1) requires that:

At unidirectional interconnection points where technical capacity is offered only in one direction, transmission system operators shall offer a daily product for interruptible capacity in the other direction.

GNI requested this amendment to ensure consistency between the requirements of the CAM NC, the Tri-partite and the rights and obligations of GNI and Shippers as set out in the GNI Code of Operations and associated Business Rules in relation to the operation of the within-day VRF product at the Moffat IP. This amendment ensures that the rights of GNI to interrupt VRF capacity as required by the CAM NC are reflected in the Tri-partite thereby ensuring compliance with the CAM NC.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

GNI agree with the self-governance statement.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

There is no lead time required for implementation following execution of the amended Tri-partite Agreement as the changes are being requested to reflect the current operation of the VRF Product at the Moffat IP.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

Zero

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No

Please provide below any additional analysis or information to support your representation

This Code Modification was proposed following a request from Gas Networks Ireland to National Grid NTS to amend the Tri-partite Agreement between National Grid, GNI (UK) and Gas Networks Ireland.

The within day VRF Capacity Product at the Moffat IP, which came into operation in April 2016, is offered on an Interruptible basis. All other Capacity Products offered by GNI are done so on a firm basis and therefore the Tri-partite which came into force in October 2015 did not explicitly cater for interruptions except in the case of an 'Exceptional Event' or an 'Emergency'.

Although the business rules and the associated GNI Code of Operations drafting in relation to the interruption procedures was agreed by all parties GNI felt it prudent to ensure that the same provisions were reflected in the Tri-partite and therefore requested the amendment.