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John Bradley, Modification Panel Secretary  
Joint Office of Gas Transporters  
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Dear John

**Modification Proposal: 0243 Amendments to the process for initialisation of  
Enduring NTS Exit (Flat) Capacity at the Moffat NTS Exit Point**

Thank you for the opportunity to comment on this modification proposal.

Gaslink makes this response in its capacity as operator of the network downstream of Moffat. As a general point, we believe that it is important to recognise the need for coordination and linkage between transportation regimes at cross-border connection points such as Moffat. The requirement for the capacity certification process was recognized by all parties both upstream and downstream of Moffat with the establishment of the Moffat Agent and the Ofgem approval of the Connected Systems Agreement & CSEP Ancillary Agreement at Moffat.

Gaslink support the implementation of proposal 0243 on the basis that the delayed initialisation process will be in accordance with the established capacity certification principles currently in use at Moffat. This will, to a degree, retain an element of compatibility between upstream and downstream transportation arrangements for the commencement of the enduring period from October 2012, and could be expected to minimise mismatches between traded volumes and upstream and downstream capacity bookings. This, in turn, could be expected to facilitate gas trading at Moffat and improve the accuracy of signals provided to National Grid NTS as to the aggregate NTS exit capacity requirements at Moffat.

In summary, we believe that the modification will go some way to providing a more coordinated and linked approach to transportation through Moffat, to the benefit of upstream and downstream market participants and the respective system operators. Accordingly we support implementation.

I hope you find this response helpful.

Yours sincerely,

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**Avian Egan**