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Re: Modification Proposal 0159: 'National Grid NTS discretionary release of Interruptible NTS Entry Capacity'

Dear Julian,

Thank you for your invitation seeking representations with respect to the above Modification Proposal.

National Grid Gas plc (Distribution), ("NGD"), in accordance with our view expressed in our representation to proposal 0156, would like to offer support for this modification proposal. If implemented, this proposal would allow additional discretionary amounts of NTS Entry Capacity to be released. We support the view expressed by the proposer that any discretionary release of additional capacity should help prevent gas being stranded off-shore therefore being inaccessible to the market. It is important that this proposal be implemented in support of the regime changes proposed for the forthcoming winter.

NGD believes that implementation would further the relevant objective set out in the NTS Gas Transporter Licence Standard Special Condition A11. Specifically, competitive access to incremental entry capacity should make more gas available to the market, thereby furthering effective competition between shippers. Also, the release of incremental capacity provides an additional mechanism for shippers to access physical transportation capability, thereby ensuring the system is being used more economically and efficiently.

Consequently NGD supports implementation of this modification proposal.

Yours sincerely

Phil Lawton
Distribution Regulation Manager