

Dear Sir

ESB as a UK gas shipper want to object to the following changes in the exit reform business rules,
Relating to "Interconnectors No. 35 The present Certification process will be discontinued."

This rule has operated in the current environment successfully since the late 1990's. The reason for its inclusion in the current rules is to prevent hoarding of capacity and thereby protecting the three jurisdictions down stream of Moffat. The removal of this rule is seen as counter productive to ensuring security of supply to the Republic of Ireland, Northern Ireland and the Isle of Mann. We request that the present process of Certification be continued in the new arrangements.

ESB would appreciate clarification on the operation of the Flex capacity product at the Moffat interconnector, there are 31 registered shippers at Moffat and a single agent representing these shippers interests, we have difficulty understanding how NGG proposes to deal with this product at this interconnector (both operationally and administratively) and what levels of Flex product individual shippers would book to meet their requirements.

Kind Regards

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