



Energy for
generations

Joint Office of Gas Transporters

By email: enquiries@gasgovernance.co.uk

09 April 2020

Dear Madam or Sir,

0720S - Amendments to the Agreed Target Quantity at the Moffat Interconnection Point

ESB Generation & Trading (ESB GT) welcomes the opportunity to provide our initial views on the **0720S - Amendments to the Agreed Target Quantity at the Moffat Interconnection Point** modification.

We are supportive of National Grid Gas's (NGG) intention to minimise inaccuracies in data received through ATQ. We agree that improvements in data can lead to more efficient operations and reduce the potential for unnecessary balancing actions, consequentially can deliver benefits for consumers.

In principle, we agree that the proposed approach is the most pragmatic and cost-efficient way to address the issues with changing within-day nominations data. However, we are concerned that the modification itself does not accurately explain the proposed solution and the practical steps required for its implementation. Specifically, we note the following concerns:

- The text appears to use GNI and GNI (UK) interchangeably, which is incorrect. While closely related and with the same parent company, they are separate entities operating separate pipeline systems. GNI is the Republic of Ireland TSO. GNI (UK) owns assets in Northern Ireland, and also the pipeline system connecting to the NTS at Moffat, running to the limit of the territorial waters of the UK, where it comes under ownership of GNI, and running to Twynholm, where it meets the pipeline owned by PTL. Arrangements at the Moffat Interconnection Point have evolved over time to comply with EU Regulations. This has led to GNI (UK) allocating all capacity in its system at Moffat to GNI and PTL, who are the designated TSOs for capacity booking on the downstream side of NGG's Exit point. GNI (UK) remains the adjacent



TSO to NGG at Moffat and the counterparty to the Interconnection Agreement with NGG. Definitions are provided in the Moffat Designated Arrangements, published under UNC0525 *Enabling EU Compliant Interconnection Agreements*.¹

- We interpret the intention of the solution as replacement of the ATQ calculation based on nominations data with use of expected net demand in the entire Irish system downstream of Moffat (i.e. Republic of Ireland, Northern Ireland and Isle of Man). However the text is confused, stating at p.3: *The proposed change is to calculate the ATQ instead using the aggregate exit demand within GNI (UK)'s system,* while on p. 5: *“the ATQ for each Gas Flow Day shall be the Aggregate Exit Demands on the GNI Transportation System in respect of a Gas Day (including Virtual Reverse Flow) minus the sum of the anticipated entry quantities from other Entry Points to the GNI Transportation System”*. The latter would indicate only net Rol demand is included in the calculation, which would not reflect gas volumes exiting GB at Moffat. We would welcome clarification in the solution and consistency throughout the text of the modification.
- We would also like to see clarifications around the proposed solution in respect of high level processes for data exchanges and roles and responsibilities of parties. There is no end-user demand from the GNI (UK) system at Moffat. Therefore, anticipated demand data will presumably be required from adjacent operators (GNI, GMO, Manx Utilities?).

Overall, if our interpretation of the proposed solution is correct, we are supportive of the approach and believe this modification should progress as a self-governance modification.

We agree with the key impacts and benefits identified in the modification.

¹ <https://www.gasgovernance.co.uk/0525>