



Making a positive difference  
for energy consumers

Paul Sullivan  
Future Networks Manager  
Gas Operations  
National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Your Ref : 2022 – Lupton – ExCS  
Email: bogdan.kowalewicz@ofgem.gov.uk

Date: 17 November 2022

Dear Paul,

**Approval of National Grid Gas plc's ("NGG") proposal for exit capacity release and exit capacity substitution as set out in the Exit Capacity Substitution & Baseline Revision (ExCS) Notice in respect of the Lupton Distribution Network (DN) exit point.**

Thank you for your letter dated 21 October 2022 outlining NGG's proposal to release remaining available NTS Exit (Flat) Capacity and to substitute NTS Non-Incremental Obligated Exit Capacity to Lupton DN Exit Point in accordance with Special Condition 9.13 (Capacity Requests, Baseline Capacity and Capacity Substitution) of NGG's gas transporter licence. We<sup>1</sup> have decided to approve this request.

**Background**

Special Condition 9.13 of your licence provides that NGG must request approval from the Authority for Entry and Exit Capacity Substitution. Exit Capacity Substitution is the process by which unsold baseline NTS Exit Capacity is moved from one or more NTS Exit Points (Donor Exit Points) to meet demand for new NTS Exit Capacity at another NTS Exit Point (Recipient Exit Point). Exit Capacity Substitution can avoid or defer the need for new investment to meet incremental capacity needs, and so help reduce the costs of gas transportation for gas customers.

**The substitution proposal**

Your letter sets out a proposal to substitute unsold NTS exit baseline capacity to Lupton DN Exit Point. This is in response to a request for 1,026,287 kWh/d from 1st October 2025 of Enduring Annual Exit (Flat) Capacity at Lupton DN Exit Point made in the July 2022 Exit

---

<sup>1</sup> The terms "we", "us" and "our" are used to refer to the Gas and Electricity Markets Authority.

capacity application window. In particular, you propose to substitute the volumes of capacity as set out in the table below.

**Table 1: Substitution proposals**

Recipient Point	Donor Points	Capacity donated (kWh/d)	Capacity received (kWh/d)	Exchange Rate <sup>2</sup>	Total Exchange Rate
Lupton	Rosecote Power Station (Barrow)	1,000,000	1,026,287	0.9744:1	0.9744:1

The substitution will be effective from 1 October 2025, and will change the capacity baselines at the Donor and Recipient points as set out in Table 2.

**Table 2: Baselines at Donor and Recipient Points**

NTS Point	Type <sup>3</sup>	Recipient/Donor	Current Baseline (kWh/d)	Proposed Baseline (kWh/d)	Remaining unsold capacity (kWh/d), as at 1 October 2025
Lupton	DN	Recipient	20,399,766	21,426,053	0
Rosecote Power Station (Barrow)	DC	Donor	11,330,000	9,930,000 <sup>4</sup>	9,930,000 <sup>5</sup>

## Our decision

In your letter you give evidence that you have made this proposal in accordance with your licence.<sup>6</sup> You have provided evidence of the network analysis you have carried out in the appendix to your letter. We are satisfied with the evidence submitted and we are content that the proposed Exit Capacity Substitution is consistent with your Exit Capacity Substitution and Revision Methodology Statement. The methodology aims to promote the economic and efficient development of the NTS, by seeking to minimise the amount of infrastructure investment to meet incremental demand for Exit Capacity.

We approve the proposal to substitute the capacity as set out in NGG's Exit Capacity Substitution and Baseline Revision Notice.

Yours sincerely,

**Adrian Richardson**

**Head of Energy Security of Supply**

For and on behalf of the Gas and Electricity Markets Authority

<sup>2</sup> The exchange rate is the ratio capacity is substituted between Recipient and Donor Points. Capacity cannot be substituted if the exchange rate is greater than 3:1

<sup>3</sup> This describes the type of offtake e.g. a Direct Connect (DC) or a Distribution Network (DN).

<sup>4</sup> 400,000 kwh/d is proposed for Holmes Chapel

<sup>5</sup> 400,000 kwh/d is proposed for Holmes Chape

<sup>6</sup> Special Condition 9.13.