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Ref: Article 28(2) TAR NC consultation with the non-UK regulatory authorities of all directly connected countries or territories, the Utility Regulator of Northern Ireland and the relevant stakeholders

Dear Sarif,

National Gas Transmission welcomes the opportunity to respond to this consultation. We note the elements of the Transportation Charging Methodology being consulted on, the Seasonal Factors, Multipliers, and discounts for Entry from LNG facilities and for entry/exit points to infrastructure with the purpose of ending isolation of GB and Northern Ireland are all embedded or would form part of TPD Section Y (Charging Methodologies)¹ were they to be used.

All UNC Signatories can propose changes to these elements of the Transportation Charging Framework via the UNC change process and can discuss these within the UNC dedicated NTS Charging Methodology Forum workgroup, NTSCMF². To date there have been no proposals to change from the levels implemented under UNC0678A³ that have been in place since October 2020.

At this time, there has been no suggestion these levels should change; however, we note these should always be under review if there are any benefits to their being changed.

We support the current position on these components. If there is a consideration these should change to further the UNC Relevant Objectives in the future, National Gas Transmission will be part of those discussions at the relevant industry workgroups.

Yours sincerely

Colin Williams
Charging & Revenue Manager

¹ <https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2023-01/24%20TPD%20Section%20Y%20-%20Charging%20Methodologies.pdf>

² <https://www.gasgovernance.co.uk/ntscmf>

³ <https://www.gasgovernance.co.uk/0678>