



**Ofgem Consultation on ‘relevant points’ of a transmission system for the purposes of Article 6(4) Gas Regulation (EC) No 175/2005
AEP¹ Comments**

The Association welcomes the opportunity to comment on this consultation. We agree that further consultation will be necessary once amendments to Chapter 3 of Annex 1 to Regulation 715/2009 are formally adopted. However we believe the text that is available is essentially the final text and in any event the text of the main body of Regulation 715/2009 is already finalised, of particular relevance here is recital 25.

The Association also considers that a consistent approach should be adopted to avoid the list of relevant points changing between now and March 2011 when Regulation 715/2009 comes into force. Otherwise NG could have to make two sets of changes to its systems to ensure compliance with EU Regulations, given the relatively short timescales involved this would seem inefficient.

We note that paragraph 3.2(b) of Regulation 1775/2005 requires points or zones that account for more than 2% of total exit capacity to be designated relevant points and that in aggregate such exit points or zones should cover at least 50% of network capacity. However no information has been provided on individual exit capacity as a percentage of the total exit capacity, albeit we would expect that if DN exit points/ zones, interconnector and storage offtakes are considered that this would account for more than 50% of total network capacity. On this basis offtakes serving individual customers or subsystems should not be considered as relevant points. We believe this approach is consistent with Regulation 1775/2005 and 715/2009 (as amended) and is also mindful of the confidentiality issues, regarding protecting confidential information regarding production processes, in recital 25 of the 2009 Regulation. Below we attach a table identifying which direct connect exit points we consider should not be relevant points under either Regulation.

We also acknowledge that Regulation 715/2009 as amended may exclude certain entry points connected to a single producer and potentially DN offtakes. But it does provide for the publication of aggregate information where individual offtake information is not published, we fully support this principle and will ensure that market participants have an understanding of the overall supply / demand situation and how this affects price

¹The Association of Electricity Producers (AEP) represents large, medium and small companies accounting for more than 95 per cent of the UK generating capacity, together with a number of businesses that provide equipment and services to the generating industry. Between them, the members embrace all of the generating technologies used commercially in the UK, from coal, gas and nuclear power, to a wide range of renewable energies.

movements in the wholesale market an important issue in promoting trading and market integration across the EU.

In the UK context we note that some of the information requirements are already published at individual offtake level such as capacity and ex post demand information, so this would not change irrespective of the points which are defined as being relevant points. Publication of this information has been progressed via UNC modification proposals; we consider this is an appropriate means of exploring data publication that goes beyond EU requirements. In that respect we believe the UK should seek to comply with EU law, with anything beyond that being subject to existing governance processes.

The Association would also like to flag here an issue of non-compliance with both the 2005 and 2009 Regulation that has been raised many times in industry fora. It is a requirement of both Regulations to publish technical capacity where this means *the maximum firm capacity that the transmission system operator can offer to the network users, taking account of system integrity and the operational requirements of the transmission network*. National Grid contends that publishing baseline values meets this requirement, yet we maintain that this does not align with the definition of technical capacity. This is particularly apparent when a new power station can connect to the transmission system with no reinforcement being required and has further been demonstrated most recently in a National Grid presentation at the exit capacity substitution workshop 4 on 25th May². NG reported that several power stations could connect in the North East part of the network without further investment being required. It therefore follows that spare capacity exists in this part of the network that is not reflected in the baseline values effectively demonstrating that technical capacity information is not being published. Transparency over network capability is a key issue being addressed by this aspect of the Regulation to ensure that network capability is not withheld from market participants and it is an important issue for the Association as an input into siting decisions for CCGTs. We would welcome Ofgem's views on this and would be happy to discuss this or any other issues raised here.

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² <http://www.nationalgrid.com/uk/Gas/Charges/statements/transportation/ExCapSubMS/>

System Point Name	System Point type	Relevant Point
Aberdeen		
Abernedd Power Station	DC	No
Abson (Seabank Power Station phase I)	DC	No
Albury		
Alrewas (EM)		
Alrewas (WM)		
Armadale		
Aspley		
Asselby		
Audley (NW)		
Audley (WM)		
Austrey		
Avonmouth	Entry	
Avonmouth Max Refill	Storage	
Aylesbeare		
Bacton	Entry	
Bacton (Baird)	Entry	
Bacton (BBL)	Entry	
Bacton (Great Yarmouth)	DC	No
Bacton (IUK)	Interconnector	
Baldersby		
Balgray		
Barking (Horndon)	DC	No
Barrow	Entry	
Barrow (Bains)	Storage	
Barrow (Black Start)	DC	No
Barrow (Gateway)	Storage	
Barton Stacey	Entry	
Barton Stacey Max Refill (Humbly Grove)	Storage	
Bathgate		
Billingham ICI (Terra Billingham)	DC	No
Bishop Auckland		
Bishop Auckland (test facility)		
Blaby		
Blackness (BP Grangemouth)	DC	No
Blackrod		
Blyborough		
Blyborough (Brigg)	DC	No
Blyborough (Cottam)	DC	No
Blyborough (Welton)		
Braishfield A		
Braishfield B		
Brine Field (Teesside) Power Station		
Brisley		
Broxburn		
Burley Bank		
Burnhervie		
Burton Point	Entry	
Burton Point (Connahs Quay)	DC	No

System Point Name	System Point type	Relevant Point
Caldecott		
Caldecott (Corby Power Station)	DC	No
Cambridge		
Canonbie	Entry	
Careston		
Carrington (Partington) Power Station	DC	No
Caythorpe	Storage	
Centrax Industrial	DC	No
Cheshire	Storage	
Cirencester		
Coffinswell		
Coldstream		
Corbridge		
Coryton 2 (Thames Haven) Power Station	DC	No
Cowpen Bewley		
Crawley Down		
Deeside	DC	No
Didcot A	DC	No
Didcot B	DC	No
Dowlais		
Drakelow Power Station	DC	No
Drointon		
Drum		
Dyffryn Clydach		
Dynevor Arms	Entry	
Dynevor Max Refill	Storage	
Easington	Entry	
Eastoft (Keadby Blackstart)	DC	No
Eastoft (Keadby)	DC	No
Easton Grey		
Ecclestone		
Elton		
Enron Billingham	DC	No
Epping Green (Enfield Energy, aka Brimsdown)	DC	No
Evesham		
Farningham		
Farningham B		
Ferny Knoll (AM Paper)	DC	No
Fiddington		
Fleetwood	Entry	
Ganstead		
Garton	Entry	
Garton Max Refill (Aldbrough)	Storage	
Gilwern	Storage	
Glenmavis	Entry	
Glenmavis Max Refill	Storage	
Goole (Guardian Glass)	DC	No
Gosberton		
Gowkhall (Longannet)	DC	No
Grain Power Station	DC	No

System Point Name	System Point type	Relevant Point
Great Wilbraham		
Guyzance		
Hardwick		
Harwarden (Shotton, aka Shotton Paper)	DC	No
Hatfield Moor Max Refill	Storage	
Hatfield Moor (On shore)	Entry	
Hatfield Moor (Storage)	Entry	
Hatfield Power Station	DC	No
Hole House Farm	Entry	
Hole House Max Refill	Storage	
Holford	Storage	
Hollingsgreen (Hays Chemicals)	DC	No
Holmes Chapel		
Horndon		
Hornsea	Entry	
Hornsea Max Refill	Storage	
Humbleton		
Hume		
Ilchester		
Ipsden		
Ipsden 2		
Isle of Grain	Entry	
Keld		
Kenn		
Kinknockie		
Kirkstead		
Langage Power Station	DC	No
Langholm		
Lauderhill		
Leamington		
Little Burdon		
Littleton Drew		
Lockerbie		
Lower Quinton		
Lupton		
Luxborough Lane		
Lyneham (Choakford)		
Maelor		
Malpas		
Mappowder		
Marchwood Power Station	DC	No
Market Harborough		
Matching Green		
Medway (aka Isle of Grain Power Station, NOT Grain Power)	DC	No
Melkinthorpe		
Mickle Trafford		
Middle Stoke (Damhead Creek, aka Kingsnorth Power Station)	DC	No
Milford Haven	Entry	

System Point Name	System Point type	Relevant Point
Milwich		
Moffat (Irish Interconnector)	Interconnector	
Netherhowcleugh		
Pannal		
Partington	Entry	
Partington Max Refill	Storage	
Paull		
Palmers Wood		
Pembroke Power Station	DC	No
Peterborough (Peterborough Power Station)	DC	No
Peterborough Eye (Tee)		
Peters Green		
Peters Green South Mimms		
Phillips Petroleum, Teeside	DC	No
Pickering		
Pickmere (Winnington Power, aka Brunner Mond)	DC	No
Pitcairngreen		
Portland		
Pucklechurch		
Rawcliffe		
Roosecote Power Station (Barrow)	DC	No
Rosehill (Saltend Power Station)	DC	No
Ross (SW)		
Ross (WM)		
Roudham Heath		
Rough Max Refill	Storage	
Royston		
Rugby		
Ryehouse	DC	No
Saddle Bow (Kings Lynn)	DC	No
Saltend BPHP (BP Saltend HP)	DC	No
Saltwick Pressure Controlled		
Saltwick Volumetric Controlled		
Samlesbury		
Sandy Lane (Blackburn CHP, aka Sappi Paper Mill)	DC	No
Seabank (DN)		
Seabank (Seabank Power Station phase II)	DC	No
Sellafield Power Station	DC	No
Shellstar (aka Kemira, not Kemira CHP)	DC	No
Shorne		
Shotwick (Bridgewater Paper)	DC	No
Shustoke		
Silk Willoughby		
Soutra		
Spalding 2 (South Holland) Power Station		
St Fergus	Entry	
St. Fergus (Peterhead)	DC	No
St. Neots (Little Barford)	DC	No

System Point Name	System Point type	Relevant Point
St.Fergus (Shell Blackstart)	DC	No
Stallingborough (phase 1)	DC	No
Stallingborough (phase 2)	DC	No
Stanford Le Hope (Coryton)	DC	No
Staythorpe PH1	DC	No
Staythorpe PH2	DC	No
Stranraer		
Stratford-upon-Avon		
Stublach (Cheshire)		
Sutton Bridge		
Sutton Bridge Power Station	DC	No
Tatsfield		
Teesside	Entry	
Teesside (BASF, aka BASF Teesside)	DC	No
Teesside Hydrogen	DC	No
Terra Nitrogen (aka ICI, Terra Severnside)	DC	No
Theddlethorpe	Entry	
Thornton Curtis (DN)		
Thornton Curtis (Humber Refinery, aka Immingham)	DC	No
Thornton Curtis (Killingholme)	DC	No
Thrintoft		
Tonna (Baglan Bay)	DC	No
Towlaw		
Towton		
Tur Langton		
Upper Neeston (Milford Haven Refinery)	DC	No
Walesby		
Warburton		
West Burton Power Station	DC	No
West Winch		
Weston Point		
Weston Point (Castner Kelner, aka ICI Runcorn)	DC	No
Weston Point (Rocksavage)	DC	No
Wetheral		
Whitwell		
Winkfield		
Winkfield (NT)		
Winkfield (SE)		
Winkfield (SO)		
Wragg Marsh (Spalding)	DC	No
Wyre Power Station	DC	No
Wytch Farm	Entry	
Yelverton		
Zeneca (ICI Avecia, aka 'Zenica')	DC	No