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Dear Giuseppina

OFGEM Consultation: Guidance on the Third Party Access regulatory regime for gas storage facilities in Great Britain.

National Grid welcomes the opportunity to respond to the Office of the Gas and Electricity Markets consultation, "Guidance on the Third Party Access regulatory regime for gas storage facilities in Great Britain". National Grid, through National Grid Electricity Transmission plc ("NGET") owns and operates the high voltage electricity transmission system in England and Wales and, as National Electricity Transmission System Operator (NETSO), operates the National Electricity Transmission System, which includes both of the Scottish transmission networks and which will, in due course, include offshore transmission systems.

National Grid, through National Grid Gas plc ("NGG"), owns and operates the gas transmission system in Great Britain and four of eight gas distribution systems in England.

This response is made on behalf of the whole of the National Grid group of companies. National Grid agrees with Ofgem that the nTPA regime is currently only applicable to two GB storage sites, Rough and Hornsea. NGG's only LNG storage sites are those at Avonmouth, Glenmavis and Partington which are nTPA exempt. The former NGG storage site at Grain is now classified as a 'LNG Facility' under Directive 2009/73/EC being a "*terminal used for...importation*"¹ and so is outside the remit of the consultation.

As the majority of questions in the consultation are focused on nTPA Storage System Operators and market players, NGG will directly respond to only one question, from Chapter 7 'Transparency and Information sharing arrangements'.

Question 3: Should SSOs publish the information required under section 19(4) on their websites or should NGG perform this role for all SSOs?

National Grid is willing to publish all the required SSO information on its website providing all costs associated with the systems change are appropriately met. National Grid has recently implemented its "European Transparency Project" which makes National Grid NTS compliant

¹ Directive 2009/73/EC, Article 2(11)

with all 3rd package transparency requirements with respect to gas. This means that we now publish all the required storage information on an aggregate basis on the National Grid website, thus meeting our TSO obligations regarding Article 19(4) of regulation (EC) 715/2009.

The UK Gas Storage Operators group approached National Grid regarding the publication of the required SSO obligated data from Article 19(4) of regulation (EC) 715/2009. National Grid has provided a number of proposals to the UK Gas Storage Operators group, and discussions are still ongoing.

Regardless of the outcome of the discussions with the UK Gas Storage Operators group, National Grid LNG will ensure compliance with the regulation within the required time scales.

I hope that this response is useful, if you need any clarification on the points made or have any questions please contact myself, on 01926 65 67 33 or at chris.logue@uk.ngrid.com in the first instance.

Yours sincerely,

Chris Logue
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