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Statutory consultation on adding new National Transmission exit points to National Grid Gas Transmission's gas transporter licence and on the categorisation of exit points

Dear Hannah

Thank you for the opportunity to respond to your statutory consultation, pursuant to section 23(2) of the Gas Act 1986, on the proposed modification to National Grid Gas Transmission's licence to add three offtake points and make changes to two other named points in the licence. This response is made on behalf of National Grid Gas' Transmission business (NGG).

Our role as the owner and operator of the GB Gas Transmission System is to ensure the safe, economic and efficient development, operation and maintenance of the National Transmission System.

Changes to the licence

As requested by NGG, we support the proposed addition of three new Offtake Points to table 8 in Special Condition 5G, Part G of the licence with an Enduring flat Baseline of 0 GWh/d as detailed below:

Offtake Point	Type of Offtake	Enduring flat Baseline (GWh/d)
Apache (Sage Black Start)	DC	0
Seal Sands TGPP	DC	0
Trafford Power Station	DC	0

Other proposed changes to the licence

We also support your proposed spelling correction of the Offtake Point "Saltfleetby Storage (Theddlethorpe)" to "Saltfleetby Storage (Theddlethorpe)" and, as we requested, the proposed name change of Offtake Point "Kintore" to "Glasgoforest" as a more accurate description of the Offtake Point.

Classification of relevant points

We support your view that:

- Kintore (to be renamed Glasgoforest) should not be considered as a relevant point as it is an Industrial Offtake connected to a single final customer.
- Apache (Sage Black Start) should not be considered as a relevant point as it is an Industrial Offtake connected to a single final customer.
- Trafford Power Station should not be considered as a relevant point as it is a Power Station connected to a single final customer.

As you correctly state, Seal Sands TGPP will be defined as a Connected System Exit Point (CSEP) for the purposes of UNC and therefore gas may be transported downstream of Seal Sands TGPP by an Independent Gas Transporter. We therefore understand the OFGEM reasoning for the classification of Sand Seals as a Relevant Point.

Should Ofgem wish to discuss any of the points raised in this response, please contact Mike Wassell at mike.wassell@nationalgrid.com (01926 654167).

Yours sincerely



Helen Campbell