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Michelle Murdoch
Ofgem
9 Millbank
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23 April 2015

Dear Michelle,

National Grid Interconnectors Limited Response to Ofgem's Minded to Decision to assign TSO obligations under the Capacity Allocation and Congestion Management Regulation (CACM Regulation) within GB.

Thank you for the opportunity to respond to the above consultation.

National Grid Interconnectors Limited (NGIC) welcomes the opportunity to respond to the above consultation. NGIC is a part owner and operator of the Interconnexion France-Angleterre (IFA) link between Great Britain and France.

NGIC commends the proactive approach that Ofgem has taken in determining the most appropriate assignment of TSOs within GB under the CACM regulation. We believe that Ofgem has correctly identified the articles of the CACM Regulation that place an impact on TSOs.

Furthermore, NGIC agrees with Ofgem's application of Article 1(3) of the CACM Regulation in assigning obligations to GB TSOs. We agree with the view that TSOs themselves are best placed in determining the most appropriate method of compliance.

Also, upon review of the Ofgem's Minded to Decision on the assignment of obligations under the CACM regulation to GB TSOs, NGIC agrees with Ofgem's view and believes that the obligations have been assigned in the most appropriate manner.

However, NGIC would like to ask Ofgem how it plans to differentiate between multiple provisions within an Article where only part of the obligations are appropriate for a TSO? This would ensure certainty of the obligations to which each TSO must comply.

On how Ofgem should assess future changes, NGIC is of the opinion that any changes would depend upon what circumstances have caused the change according to the list detailed in Ofgem's Minded to Decision. We believe it would be appropriate for there to be an initial assessment made in conjunction with the likely affected TSO(s), and for this to be followed by a formal assignment process.

We are happy to discuss our views contained in this letter further should that be helpful. For further details, please contact Vince Hammond [vince.hammond@nationalgrid.com]. This

response is not considered confidential; therefore we are happy for it to be published on the Ofgem website and shared for the purpose of the consultation.

Yours sincerely,

Vince Hammond

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