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15th April 2016

Consultation on the addition of new National Transmission System exit points to National Grid Gas Transmission's gas transporter licence ("the licence") and their categorisation.

Dear Sean,

Thank you for the opportunity to respond to your statutory consultation, pursuant to section 23(2) of the Gas Act 1986. In response to our request, your consultation proposes the addition of three new Offtake Points to table 8 in Part F of Special Condition 5G of the licence, these being "Palm Paper", "Kinneil CHP" and "St Fergus Segal". Your consultation also proposes that the new offtake point, St Fergus Segal should be classified as a relevant point whereas Palm Paper and Kinneil CHP new Offtake Points should not be classified as relevant points under the EU Gas Regulation EC No 715/2009.

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 on the 15th of January 2016, we support the proposed addition of three new Offtake Points to table 8 in Part F of Special Condition 5G of the licence as detailed below:

Offtake Point	Type of Offtake	Enduring flat Baseline (GWh/d)
Palm Paper	Direct Connect (DC)	0
Kinneil CHP	Direct Connect (DC)	0
St Fergus Segal	Direct Connect (DC)	0

Designation as “relevant points”

Under Article 18(4) of Gas Regulation (EC) No 715/2009, the relevant points of a transmission system on which the information is to be made public shall be approved by OFGEM after consultation with network users.

Paragraph 3.2(1)(a) of Chapter 3 of Annex I to Gas Regulation (EC) No 715/2009 provides that exit points connected to a single final customer are excluded from the definition of relevant points. It is our understanding that both Palm Paper and Kinneil CHP are connected to a single final customer and therefore support your proposal that they should be excluded from the definition of relevant points. We also agree that St Fergus Segal should be defined as a Relevant exit point as it is our understanding that gas will be transported further downstream of the NTS Exit Point and, therefore, there may be more than one final customer.

Should Ofgem wish to discuss any of the points raised in this response please contact Darren Lond at darren.lond@nationalgrid.com (01926 653493).

Yours sincerely



Nicola Pitts
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