

Kirsty Earle
Gas System Integration
Ofgem
32 Albion Street
G1 1LH

Craig Dyke
Gas Network Development Manager

craig.dyke@nationalgrid.com

Direct tel +44 (0)1926 653397

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www.nationalgrid.com

Statutory consultation on the proposed addition of new exit and entry points to National Grid Gas plc's gas transporter licence and statutory consultation on the classification of exit and entry points as designated points under Article 18(4) EU Gas Regulation.

Dear Kirsty,

Thank you for the opportunity to respond to your statutory consultation.

On 29th March 2018, National Grid Gas requested modification to our Gas Transporter Licence to modify Special Condition 5F and 5G of the NTS licence. Part A of this request was to include 3 new points to the licence and Part B was to propose a change to the process for adding new points into the Licence which have a zero baseline capacity. This change of process was proposed in order to facilitate the implementation of Project CLoCC¹ (Customer Low Cost Connections) and potential quicker connection timelines.

Following our discussions, on 22nd August 2018, we agreed to move forward with Part A to include these three new points into the licence whilst we further developed Part B which proposes the modification to the process. This is an ongoing piece of work which will require further consultation as we have discussed and agreed.

In response to our request, your consultation proposes the addition of two new Offtake Points to table 8 in Part F of Special Condition 5G of the licence, these being "Keadby 2 Power Station" and "Eggborough Power Station". In addition, the new Entry Point "Murrow" to table 4B in Part F of Special Condition 5F of the licence. Your consultation also proposes that the new offtake points and new entry point 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 (NGG) in our role as the owner and operator of the GB National Transmission System (NTS).

¹ Project CLoCC, National Innovation Competition project – see www.projectclocc.com

Changes to the licence

We support the proposed addition of two 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)
Keadby 2 Power Station	DC	0
Eggborough Power Station	DC	0

We support the proposed addition of a new entry point to table 4b in Part F of Special condition 5F of the licence as detailed below:

NTS Entry Point	Type of Entry	Baseline Capacity (GWh/d)
Murrow	BIOMETHANE PLANT	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 1 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 new exit points are connected to a single final customer and therefore support your proposal that they should be excluded from the definition of relevant points.

Furthermore, the regulation provides that entry points linked directly to a single producer are excluded from the definition of relevant points. It is our understanding that the new entry point will be connected to a single producer and therefore support your proposal that they should be excluded from the definition of relevant points.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'CD', is centered on a light gray background.

Craig Dyke

Gas Network Development Manager