

Mr Mark Lyndon
Commercial Analyst
National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA
United Kingdom

Cc: box.transmissioncapacityandcharging@uk.ngrid.com

30th March, 2012

Re: **The Exit Capacity Substitution and Revision Methodology Statement**

Dear Mark,

Gaslink welcomes the opportunity to respond to National Grid's consultation regarding the Exit Capacity Substitution and Revision Methodology Statement – Effective from July, 2012 which was published on 24th February, 2012. The Moffat Interconnection Point is of fundamental importance to secure deliveries of Natural Gas to the island of Ireland as well as to Stranraer in Scotland and to the Isle of Man.

As stated in correspondence of 7th November, 2011 Gaslink does not support National Grid's view that utilising Gaslink's Technical Capacity is the most appropriate method to determine protected capacity (i.e. capacity which may not be substituted) at Moffat. The Moffat Connected Systems Agreement (Annex B.2 Section 2.8) states a value of 18,057MW Variable - 431.574GWh. We wish to protect this level of capacity.

Our understanding is that this would be implemented through incorporation of provisions in the Exit Capacity Substitution and Revision Methodology Statement to the effect that:

- (1) An amount of capacity (the "Minimum Baseline") equal to the Capacity for the Moffat Entry Point (as stated in the CSA) would not be Substitutable Capacity under the methodology; and
- (2) As a consequence, the NTS baseline exit capacity at the Moffat NTS Exit Point may not be reduced under the methodology to a level less than the Minimum Baseline.



We appreciate that the exact wording in the statement might be different from the above, but we would be grateful if you could confirm that we have understood the intended effect of the provisions correctly.

Finally, we believe that the approach to determining the protected capacity as proposed by Gaslink is more consistent with EU requirements, including those with respect to the requirement for sufficient cross border capacity, and best protects security of supply.

Please do not hesitate to contact me if you would like to discuss any aspect of this further.

Yours sincerely,

A handwritten signature in black ink that reads "Celine Hayes". The signature is written in a cursive style and is positioned above a horizontal line.

Celine Hayes,
Manager – Transportation Projects