

1. What further developments do you see happening within the energy regime (either specific to your sector or more broadly) by 2030 which could have any influence on the 2030 scenario?

Problem Definition

I think a clear problem statement with benefits statement is required. This will identify and quantify benefits from a consumer's perspective. Then we can start to identify a solution.

The issue is further challenged given the significant uncertainty of decarbonisation of energy.

Some solutions like A "Pay as flow" will work in a gas network that is unconstrained. However, if the network is constrained this will not work.

2. What option/combination of options (outlined in Section 3c, and further detailed in Appendix C of this document) do you believe best achieve the 2030 scenario and why?

Firm Access Rights

From an off takers User's perspective it is essential that firm exit rights are available when required. This is so that gas fired generation can keep the lights on in the electricity market. If access is not guaranteed then electricity cashout costs and capacity market penalties will dwarf any potential gas access benefits, to say nothing of customers loss of electricity supply and brown outs affecting daily life.

Co-ordination with ESO

There is a need for this review to work closely with the future independent system operator so that the needs of customers in a decarbonising energy complex are understood.

Wait

There is significant uncertainty over H2 deployment and re-purposing 25 % of the methane network into a H2 network. This will have significant impact on the choice of access regime from CH4. Until there is more clarity on H2, I suggest the ToR and benefits document are developed, then access solutions can be addressed in a number of years. This will have the added benefit so that firm dispatchable electricity other than CGCTs can be developed such as pumped storage for long term supply and batteries for short term supply. This will then permit some flexibility in gas CCGT operation and consequently for the gas network operation.

Therefore, it is not possible to express a clear preference for a particular option or options at this time.

3. When should further development and implementation of the preferred option take place?

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4. Are there any other options which should be considered? Please provide any details of how you would see the options working at a high level.

Charging

Again, from a customers perspective charging is key. Key drivers in an access regime is how much it costs. A lot of recent modifications impacting on capacity have been driven by cost avoidance and the need to reduce costs arising from the new charging regime of 678A. The issue is not primarily with capacity. Understanding of costs and shipper behaviour will be key to any future access change. Hence, the tentative support for a commodity /flow type charge/access regime but that must be unconstrained.