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Submission on Modification 097: Modification to release aggregated ex-post information for pipeline Interconnector offtake flows.

Bord Gais Energy Supply (BGES) welcomes the opportunity to make a submission on proposed Mod 097. The rationale for the Mod proposal appears to be based around the fact that increased information provisions on interconnector flows would aid demand forecasting and analysis.

Given the Irish interconnector is classified as a Very Large Daily Metered Customer (“VLDMC”) offtake point on the UK system, BGES are of the opinion that the mod proposal should be applied on an “all or nothing” basis i.e. the provisions of the mod should apply and extend to all VLDMC offtakes. Given the objective of more information transparency, we believe further information on demand profiles at such large offtake points would extend the benefit of this proposal and do not support its application to particular VLDMC’s in isolation. In its current form, BGES do not see any tangible benefits from this modification proposal for Moffat only but would support this modification if it encompassed all VLDMC’s.

Regards,

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