

Representation - Draft Modification Report 0546S

Reduction of the Minimum Eligible Quantity (100,000kWh) for European IP capacity

Responses invited by: **10 September 2015**

To: enquiries@gasgovernance.co.uk

Representative:	Lauren Skillen-Baine
Organisation:	Premier Transmission Limited
Date of Representation:	9 th September 2015
Support or oppose implementation?	Support
Relevant Objective:	g) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

This proposal will further support the potential for firm capacity bundling as required under CAM. Premier Transmission Limited (PTL) is one of the Transmission System Operators in Northern Ireland (NI) and shall be bundling firm capacity with National Grid. If a Minimum Eligible Quantity of 100,000kWh was implemented, it would be considered to be a significant barrier to entry for new Shippers wishing to operate in the NI market. Our experience has shown that new entrants often require a smaller amount of firm capacity during their start-up phase. The higher amount would also create problems for some of the existing Shippers who at times require less than this value. As the reduction to 1kWh is essential for the NI market, PTL strongly support this proposed change.

Self-Governance Statement: Please provide your views on the self-governance statement.

PTL support the self-governance statement and procedures proposed.

Implementation: What lead-time do you wish to see prior to implementation and why?

PTL would like to see implementation prior to the first bundled auctions.

Impacts and Costs: What analysis, development and ongoing costs would you face?

Not Applicable.

Legal Text: Are you satisfied that the legal text will deliver the intent of the Solution?

Yes.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No.

Please provide below any additional analysis or information to support your representation

Not Applicable.