

Code Modification No. A063 - 'Nominations, Imbalance Charges & Allocations'

Initial allocations only state "end of D+1" (currently 16:00 D+1). I propose that the timeframe remains unchanged at 16:00 D+1 so as to give shippers sufficient time to send out their allocations to customers. Otherwise customers may not get their allocations until D+2 if the allocation is sent out late on D+1.

GTMS currently shut down at 01:45, if re-nomination is going to occur up to 02:00 D then is GTMS going to stay operational for a longer period also?

BGE are opposed to any increase in imbalance charges. Imbalance charges will already increase due to the elimination of tolerances – increasing imbalance prices will exacerbate the situation. Gaslink will need to elaborate what will occur if a Powergen customer is constrained off at short notice.

How are imbalances on NDM to be dealt with? If an imbalance occurs on the NDM – who is responsible – the shipper or the transporter?

Currently we do not get within day updates on the DM segment. Are their plans to provide updates on these? Without updates this segment will be subject to increased costs on balancing.

We are in agreement with removal of the Moffat Agent only if the risks, which the introduction of the Moffat Agent removed, remain covered off by the implementation of the new rules

"5.3.3 Each Shipper shall have an Initial Daily Imbalance Quantity attributed to its Interconnector Balancing Portfolio based on the extent that its inputs are less than its outputs." Why is this the case? Why less than only?

The imbalance price could be quite penal which is unfair given the supplier will not have view of full information to allow it to balance. Therefore a tolerance, even if smaller than the current tolerance would provide some relief

4.3.3 With the removal of ZIP, how does the Transporter propose to manage the security of the network, especially given the commencement of a new indigenous field.

Operational Balancing Options

BGE would welcome a review to see if there is an option that a flexible provider could provide gas at the IBP or the NBP and the optionality would give the Transporter the ability to achieve lower prices