

Our date  
2016-09-15

Our reference

Administrative officer

Your date

Your reference  
**A078 Overrun Charges at Domestic Entry Points**

1 of 1

Gas Networks Ireland  
Attn.: Andrew Kelly  
Gasworks Road  
PO Box 51 Cork  
Ireland

Dear Andrew,

Statoil welcomes the opportunity to respond to Code Modification Proposal A078 for which we support its implementation...

Based on our experience in other markets, Statoil feels that all capacity should be brought to market on non-discriminatory terms, and sees it as crucial to ensure the existence of ex-ante rules aimed at mitigating any subsequent attempt at capacity hoarding.

Statoil sees A078 as an interim measure. Its sole purpose is to give immediate effect to the existing anti-capacity hoarding measures in the Code of Operations. We support the proposer's view that there should be continued industry discussion to identify a more enduring solution going forward.

Statoil sees A078 bringing unutilised capacity back to market on an interruptible basis in the event that all original capacity has been booked. We agree with the proposer's view that the overrun charge should be equivalent to the level of the multiplier applicable at the time. Statoil would also like to point out that it fully supports the IOOA letter for this consultation.

If you have any questions regarding this letter please let me know as soon as possible.

**Best Regards**



**Terry Burke**  
Regulatory Affairs Adviser  
Statoil

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