



Irish Offshore  
Operators'  
Association

## Irish Offshore Operators' Association

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Mr Conor Long,  
Gas Networks Ireland,  
Gasworks Road,  
Cork

27 April 2016

By email: [conor.long@gasnetworks.ie](mailto:conor.long@gasnetworks.ie); [marketdevelopment@gasnetworks.ie](mailto:marketdevelopment@gasnetworks.ie)

**Re: Initial Modification Report – Code Modification A071**

Dear Conor,

IOOA's members welcome the opportunity to respond to the Initial Modification Report for Code Modification A071. Please see below IOOA's members comments:

- Due to the reasons for the rejection of code modification A069 by the CER, the focus of A071 needs to be on a scheme whereby GNI buys back firm entry capacity at an entry point affected by a GNI outage. This capacity buy back needs to reflect the value of the lost capacity at the affected entry point on the day and the cost of procuring alternative entry capacity so should be refunded at a minimum at the short term daily multiplier rate for the affected entry point if not a higher rate to reflect the interruption.
- All of the four scenarios considered by the Transporter should apply to this proposal. The concept is if a shipper is interrupted by the Transporter that the shipper should be refunded for such an interruption.
- IOOA's members note that if A071 as outlined above was in place before Corrib came on line and with the current absence of interruptible capacity in the Irish Code of Operations there would have been no need for a commissioning tariff at Corrib.
- IOOA's members note that shippers in proposing a code modification will initially outline the sections of the code of operations that potentially need to be modified, however, a code modification may change as it progresses through the code modification process and the associated proposed sections that require change. One of the roles of GNI in the code modification process is to identify the specific sections of the code of operations that require changing should a proposed code modification be accepted and propose legal wording for the required changes to the code of operation.

Yours sincerely,

Steve Boldy  
Chairman IOOA Gas Sub-Committee and on behalf of:

AzEire Petroleum

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Providence Resources,  
Repsol,  
San Leon Energy,  
Serica Energy,  
Shell,  
Statoil,  
Vermilion Energy Ireland,  
Woodside.

Cc: Patrick Shannon Chairman IOOA  
IOOA Management Committee  
IOOA Gas Sub-Committee  
John Melvin CER ([jmelvin@cer.ie](mailto:jmelvin@cer.ie))