

Response received by email from Warren Deacon on 08 February 2016

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Hi Conor,

ESB GWM welcomes the opportunity to respond to this consultation.

We recognise that GNI seeks to minimise the impact on shippers when carrying out maintenance and from ESB GWMs perspective this has worked well to date. It is our view that more information needs to be provided in the first instance as it is not clear at this point if this Code Modification is necessary. There was mention at the Code Modification Forms of some shippers being interrupted and so an analysis of the extent of this may be warranted. Also, increasingly and into the future it may not always be possible to avoid an interruption (e.g. due to increasing wind intermittency). Therefore an analysis would be beneficial to understand if there is an increased risk of capacity being interrupted in the coming years and we would suggest that the following is discussed in more detail:

- GNI's annual maintenance schedule. What is the expected volume and duration of the capacity reduction resulting from planned maintenance at each entry and exit point?
- Historical GNI maintenance. Can previous years be reviewed to understand the volume and duration of the capacity reduction resulting from planned/unplanned maintenance at entry and exit points?
- Can GNI disclose in a generic format the impact that this maintenance work has had on bookings. (e.g. 2015 saw a reduction of XGWh at all entry and exit points due to GNI maintenance which resulted in XGWh of shippers capacity being interrupted).

Regards,

Warren