



equinor

Kieran Quill
Gas Networks Ireland
PO Box 51, Gasworks Road
Cork
Republic of Ireland

Our reference: Balancing Arrangements Consultation
Your reference: A094 & A095
31 July 2018

Dear Kieran,

Equinor Energy Ireland Limited (EEIL) welcomes the opportunity to respond to GNI Balancing Arrangements consultation paper dated 3rd July and offers our comments below;

A094: Changes to Shipper Portfolio Tolerances

Q1. What do you believe is the appropriate tolerance level for each category of customer?

A1. EEIL believes zero tolerances should be applicable for LDM and DM Shippers as consistently outlined in our previous consultation responses. EEIL believes the removal of these tolerances will boost liquidity at IBP as shippers will have to trade their daily imbalances at IBP. EEIL does however support IOOA view regarding NDM shippers having a tolerance for the difference between allocation & nominations.

Q2. What are your views as to the appropriate dates for the two-step reduction proposed?

A2. EEIL see no value in implementing a two-step reduction proposal and feels the proposal should be removed. Implementing a two-step reduction introduces an un-necessary layer of complexity. The new tolerance levels should be implemented on 1st October 2018.

A095: Revised Methodology for calculation of Daily Imbalance Charges

Q3. What is your view as to the magnitude of the small adjustment to be used in the calculation of the marginal sell price and the marginal buy price?

A3. EEIL supports GNI proposal to implement an adjustment of 3.5% and feels this is more in keeping with other European markets. This level of adjustment provides shippers with an appropriate incentive to balance their portfolios. EEIL also feels a review of the adjustment should take place after 6 months of implementation.

Q4. Do you believe the liquidity threshold criteria provided above are appropriate?

A4. EEIL supports the GNI proposed liquidity threshold criteria and feels this threshold should be reviewed in conjunction with the adjustment as mentioned in Q3.

Q5. What is the appropriate date for the implementation of the new methodology for calculation of the cashout prices?

A5 1st October 2018 should see full implementation of all Balancing Arrangements outlined. EEIL does not agree with views expressed at the previous code mod around the perceived lack of transparency as the industry has discussed these measures since 2016 via numerous consultations and meetings

Yours sincerely,

Terry Burke
Equinor Energy Ireland Limited