

Vermilion Energy Ireland Response to A083 22/05/17

Dear Andrew,

With respect to Code Modification Proposal “A083 Interruptible Capacity at Non IP Entry Points”, Vermilion Energy fully supports the letter from IOOA that will be sent to you today.

As Corrib Producer, we are concerned that in certain circumstances we run the risk of incurring significant costs if production is shut in or facing (high) overrun charges due to being unable to access unutilized system entry capacity. As party who has invested considerable amounts of money in the Irish energy market, it seems more than reasonable that we seek to mitigate this risk.

Given that GNI already has the operational and technical ability to provide interruptible services (ref VRF), it would seem reasonable to conclude that the level of additional expenditure to deliver A083 should not be prohibitive. Nevertheless, in order to address any possible concerns regarding costs, a compromise way forward could be as follows:

- The rules to deliver A083 are developed, agreed and changes to the Code of Operations implemented; and
- GNI initially uses a manual workaround to provide the new interruptible service, with any future possible systemization, i.e. costs, based on uptake of the service.

Best regards,

Henk Kreuze

For and on behalf of Vermilion Energy Ireland Limited

Henk Kreuze

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