



Michael Bell,  
Gas Networks Ireland,  
Gasworks Road,  
Cork

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By email:

[marketarrangements@gaslink.ie](mailto:marketarrangements@gaslink.ie)

[Michael.bell@gasnetworks.ie](mailto:Michael.bell@gasnetworks.ie)

**Re: Code Modification A066- EU Network Code Implementation: Transitional Arrangements Business Rules version 1.0**

Dear Mr. Bell,

Vermilion refers to the above referenced document in which market participants were requested to provide their opinions.

Vermilion is in support of the changes proposed in the subjected document. In particular, Vermilion welcomes the removal of the requirement to hold Long Term Capacity in order to request Short Term Capacity (section 7). We further welcome the continuation the Entry Point Transfers (section 9.1.2), as this is important with Corrib coming on stream in the near future. The removal of the requirement to hold exit capacity in order to trade at the IBP is clearly beneficial for the development of the Irish gas market (section 10). Vermilion further welcomes the extension for booking next year's annual capacity (section 3).

Vermilion is grateful to GNI and CER for the constructive engagement with the industry on these matters.

Yours sincerely,



Henk Kreuze  
Vermilion Energy Inc.  
On behalf of  
Vermilion Energy Ireland Limited