Assessment of Market Demand for Bi-Directional Capacity at the Moffat Interconnection Point

22nd of June 2026

Contents

1. Introduction

Under both EU and UK law Transmission System Operators ("**TSOs**") must endeavour to enable permanent physical capacity to transport gas in both directions 'bi-directional capacity', or 'Physical Reverse Flow' ("**PRF**"') on all interconnections / Interconnection Points ("**IP**"), except where an exemption from that obligation has been granted from the relevant authorities, after detailed assessment and after consulting in accordance with legislative requirements.

In 2019 Gas Networks Ireland ("**GNI**") and National Gas ("**NGT**") formerly National Grid Gas ("**NGG**") were granted an exemption from that obligation at the Moffat IP, and again in 2022 by the Commission for Regulation of Utilities ("**CRU**") in Ireland and by the Department for Business, Energy and Industrial Strategy ("**BEIS**") in the UK, acting as the Competent Authorities as defined under Regulation (EU) 1938 / 201. The role of Competent Authority in the UK now rests with Department for Energy Security and Net Zero ("**DESNZ**"). The current exemptions will expire on the **28th of September 2026**.

Following on from Brexit, the requirements regarding bi-directional capacity (and many other aspects of security of supply) were transposed into UK law via UK Statutory Instrument ("**S.I.**") 2019 No. 531. When the UK was a member of the EU, the obligation under EU law related to bi-directional capacity between Member States, so consideration of bi-directional capacity from the Northern Ireland gas network to Great Britain was not within scope. That has changed under UK law, which now requires consideration of potential market demands for PRF in Northern Ireland and the joint involvement of Premier Transmission Ltd. ("**PTL**") in the process. The relevant legislation (in both the EU and UK) sets out, clearly, that a proposal for enabling or enhancing bi-directional capacity or a request for granting or prolongation of an exemption shall include a cost benefit analysis ("**CBA**") based on the following elements:

- an assessment of market demand (see Section 2);
- projections for demand and supply (see Section 3);
- the possible economic impact on existing infrastructure (see Section 4);
- a feasibility study (see Section 5);
- the costs of bi-directional capacity including the necessary reinforcement of the transmission system (see Section 6); and
- the benefits to the security of gas supply taking into account the possible contribution of bi-directional capacity to meeting the infrastructure standard set out in the relevant legislation (see Section 7).

The purpose of this Market Assessment consultation paper is to enquire of the market as to the potential demand(s) for bi-directional capacity at Moffat, such that the TSOs can subsequently discharge their obligations in accordance with the relevant legislation.

Accordingly, this document mirrors the above elements solely to provide context on the current position and a high-level, indicative assessment of the costs and benefits of a hypothetical scenario in which bi-directional capacity enables gas transport from Ireland to Moffat via Gormanston.

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This document has been jointly drafted, and is hereby issued, by NGT, GNI and PTL (referred to in the document as "**the TSOs**"). Respondents are invited to return the completed questionnaire by the 22nd of July. See **Section 2** for details on how to respond to this paper.

It should be noted that even if an exemption is requested and subsequently granted, this does not preclude work being progressed to enable bi-directional capacity beyond the expiry of that exemption. Interested parties can still progress a demand indication for bi-directional capacity at a later date via the Incremental Capacity Process.

1.1 Legislative basis

1.1.1 Security of Gas Supply Regulation (EU) 1938 / 2017

Regulation (EU) 1938 / 2017 concerning measures to safeguard the security of gas supply in the EU (the "**Security of Gas Supply Regulation**") requires that TSOs shall enable permanent physical capacity to transport gas in both directions ('bi-directional capacity') on all interconnections between EU Member States. This requirement is captured under Article 5 (Infrastructure Standard) of the Security of Gas Supply Regulation, which states that;

4. *"**The transmission system operators shall enable permanent physical capacity to transport gas in both directions ('bi-directional capacity') on all interconnections** between Member States, **except**:*
   - *(a) in the case of connections to production facilities, to LNG facilities and to distribution networks; or*
   - *(b) **where an exemption from that obligation has been granted, after detailed assessment and after consulting other Member States and with the Commission in accordance with Annex III**".*

Furthermore, Annex III states that;

2. *"To enable or enhance bi-directional capacity on an interconnection or to obtain or prolong an exemption from that obligation, **transmission system operators on both sides of the interconnection shall submit to their competent authorities ('competent authorities concerned') and to their regulatory authorities** ('regulatory authorities concerned') after consulting with all transmission system operators potentially concerned:*
   - *(a) proposal to enable permanent physical capacity to transport gas in both directions for permanent bi-directional capacity concerning the reverse direction ('physical reverse flow capacity'); or*
   - *(b) a request for an exemption from the obligation to enable bi-directional capacity.*

   The transmission system operators shall endeavour to submit a joint proposal or request for exemption."

1.1.2 The Gas (Security of Supply and Network Codes) (Amendment) (EU Exit) Regulations 2019 No 531

Following Brexit, the Security of Gas Supply Regulation was transposed into UK law via UK S.I. 2019 No. 531; the Gas (Security of Supply and Network Codes) (Amendment) (EU Exit) Regulations 2019, with amendments as set out in its Schedule 1.

The relevant requirements regarding bi-directional capacity are amended to state the following, at Article 5(4);

> *"The **transmission system operators must endeavour to enable permanent physical capacity to transport gas in both directions ('bi-directional capacity') on all interconnections** between the United Kingdom and Member States, **except**:*
>
> *(a) in the case of connections to production facilities, to LNG facilities and to distribution networks; or*
>
> *(b) **where an exemption from that obligation has been granted, after detailed assessment and after consulting in accordance with Annex III**.*

As amended under UK S.I. 2019 No. 531, Annex III states that;

> 2. *"To enable or enhance bi-directional capacity on an interconnection or to obtain or prolong an exemption from that obligation**, the transmission system operator on the side of the interconnection in the United Kingdom must submit to the Secretary of State and the regulatory authority** after consulting with all transmission system operators potentially concerned:*
>
> *(a) a proposal to enable permanent physical capacity to transport gas in both directions for permanent bi-directional capacity concerning the reverse direction ('physical reverse flow capacity'); or*
>
> *(b) **a request for an exemption from the obligation to enable bi-directional capacity.***
>
> *The transmission system operator in the United Kingdom must endeavour to submit a joint proposal or request for exemption with the transmission system operators on the other side of the interconnection".*[1]

Under both the EU and UK Regulations the Competent Authorities may "***grant or prolong a temporary exemption for a maximum period of four years***".

[1] With respect to Moffat, this means that NGT must endeavour to submit a joint proposal with GNI and PTL.

1.2 Overview

The Moffat Interconnection Point is currently unidirectional as it supports gas flows from Great Britain to Republic of Ireland ("**ROI**"), the Isle of Man ("**IOM**") and Northern Ireland ("**NI**") only. In cases such as this, the regulations concerned (in both the EU and UK) provide that a Market Assessment must be carried out in a transparent, detailed and non-discriminatory manner to assess whether bi-directional capacity should be enabled at Interconnection Points, or whether an exemption from this requirement is appropriate.

Where there is insufficient market demand, and assessment shows that the investment costs would significantly outweigh any prospective benefits, then TSO's may make a request for an exemption from the obligation to enable bi-directional capacity, in order to satisfy both the EU and (amended) UK Regulations. Such exemptions can only be granted for a maximum of four years, therefore the TSOs anticipate that any exemption granted at this time would expire prior to 1st October 2030.

Figure 1: *Pipelines from Moffat to Republic of Ireland and Northern Ireland*

2. Assessment of Market Demand

The purpose of this paper is to enquire of the market as to whether there is sufficient demand, and the timing of same, to support undertaking the necessary investment(s) to enable gas to flow physically (bi-directional capacity) from Ireland and/or Northern Ireland to Great Britain, most particularly prior to October 2030 to inform the length of any subsequent exemption.

2.1 Invitation to Declare Interest

Respondents are invited to indicate whether or not they have such interest by completing the questionnaire attached in **Appendix A**. Respondents are asked to specify any interest they may have by indicating:

(i) when they would like to have Bi-Directional Capacity from
(ii) the volume
(iii) duration of that demand, and
(iv) to note potential financial commitments required to progress Bi-Directional Capacity.

Respondents expressing an interest in Bi-Directional Capacity will be contacted for further discussion, including around the commitment which may be required of them, and the options available to give this investment signal. Feedback from interested parties regarding how this process could be improved in the future is also welcome.

Respondents are invited to return the completed questionnaire by the 22nd of July 2026 to:

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2.2 Process

Interested parties have until the 22nd of July 2026, to respond to the questionnaire in **Appendix A**. However, given the timelines and the level of work involved the TSOs request that any market participants genuinely considering applying for bi-directional capacity, contact the TSOs as soon as practicable in order to discuss potential requirements at the earliest possible stage. It is anticipated that any binding agreements necessary would be entered into by market participants with the relevant TSOs using the existing processes pertinent to each TSO, for which regulatory oversight exists. This will be completed as soon as reasonably practicable following the initial expression of interest but can be expected to take a number of months.

As part of this process, and as required under both the EU and UK regulations, the TSOs are required to consult with other "*Transmission System Operators potentially concerned".*

Following this Market Assessment consultation, the TSOs will assess whether any 'credible' market demand has been expressed—i.e. demand that could reasonably change the supply–demand balance and justify bi-directional capacity, particularly within the exemption period up to 28 September 2030.

Where credible market demand has been expressed, the TSOs will engage with the relevant project promoters, Competent Authorities, and Regulatory Authorities (who will have access to consultation responses) to determine appropriate next steps.

It is anticipated that the Competent Authorities and Regulatory Authorities concerned will assess the draft proposal or draft request for an exemption made by the TSOs and provide comments as they see fit.

3. Projections for demand and supply

The analysis contained within this document has been drawn from the Gas Networks Ireland 2024 Network Development Plan (NDP) and the 2025/26 Northern Ireland Gas Transmission Outlook (NI GTO) publications and contains a five year[2] supply / demand forecast for the island of Ireland.

Until 2016, the majority of the gas demand in the Republic of Ireland and all of the gas demand in Northern Ireland was supplied with gas imported from Great Britain through the Moffat IP, with the remainder being supplied from indigenous gas production / storage at Inch. The Corrib gas field, following commencement of production in December 2015 and a subsequent period operating at full capacity, reached a production plateau at the beginning of 2018. A steady decline in production has been observed since January 2018, in line with supply profile projections as provided by the operators of the Corrib gas field. The reduction in Corrib gas supplies re-established the Moffat IP as the dominant supply point in 2018/19. The subsequent decommissioning of the Kinsale gas fields in July 2020 has solidified Moffat's position.

In 2023/24 Corrib met 16% of annual Gas Networks Ireland system demands (22% of ROI demand), with the Moffat Entry Point providing the balance of gas supplies (84%). Corrib gas is anticipated to meet 7.4% of the forecasted GNI peak day demand (10% of ROI demand) and 12% of the annual GNI system demand (15.8% of ROI demand) in 2026/27. The Corrib production profile, as provided to Gas Networks Ireland by the Corrib partners, is now in depletion, and is projected to reduce to approximately 16% of its peak production by 2029/30. Corrib gas is anticipated to meet 5% of the forecasted GNI peak day demand (6.6% of ROI demand) and 8% of the annual GNI system demand (11.2% of ROI demand) in 2029/30.

The introduction of renewable gas onto the Irish gas network for the first time in 2019 at Cush, Co. Kildare marked a significant milestone for the gas network. The share of renewable gas in the network is set to continue to grow over the coming years and is projected to reach 7.1% of ROI demand in 2029/30.

Figure 2 outlines the supply and demand outlook for the island of Ireland over the next 5 years for the median scenario as published in the Gas Networks Ireland 2024 Network Development Plan.

[2] The five year time frame includes the current gas year 2025/26 and extends out to October 2030.

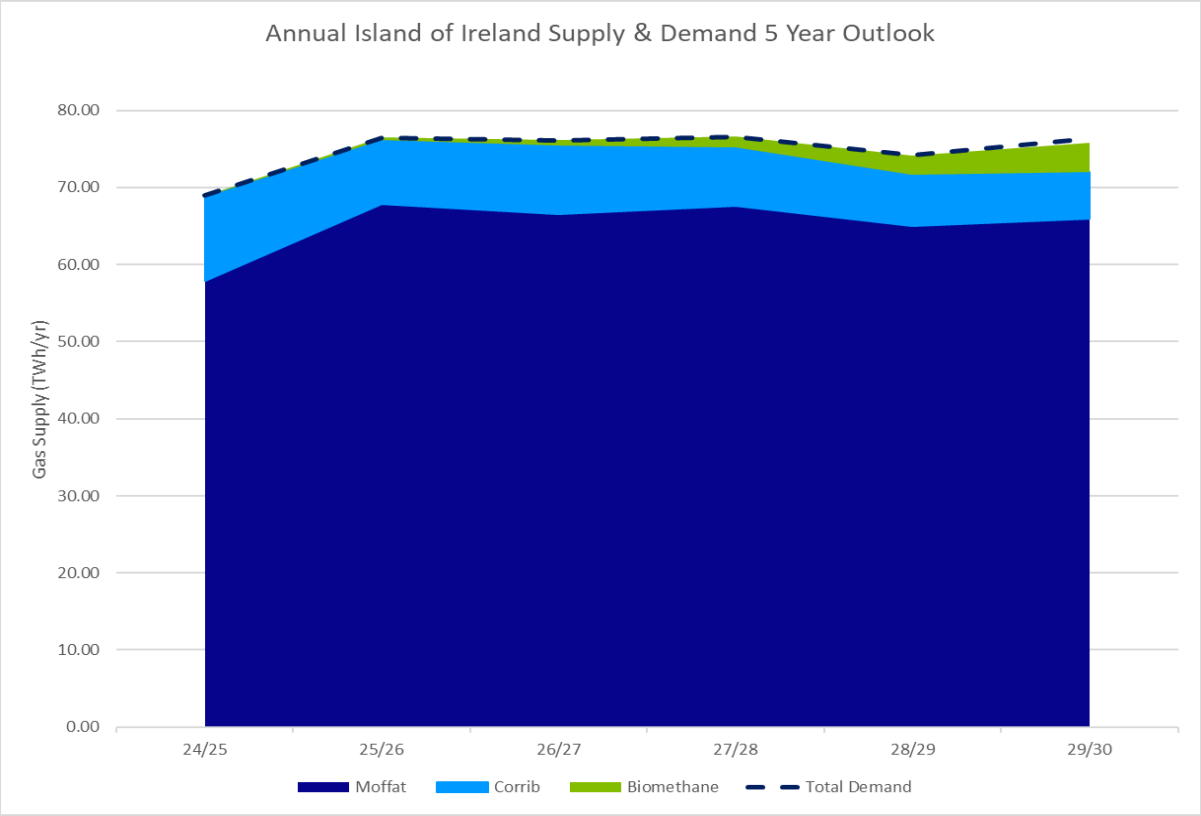
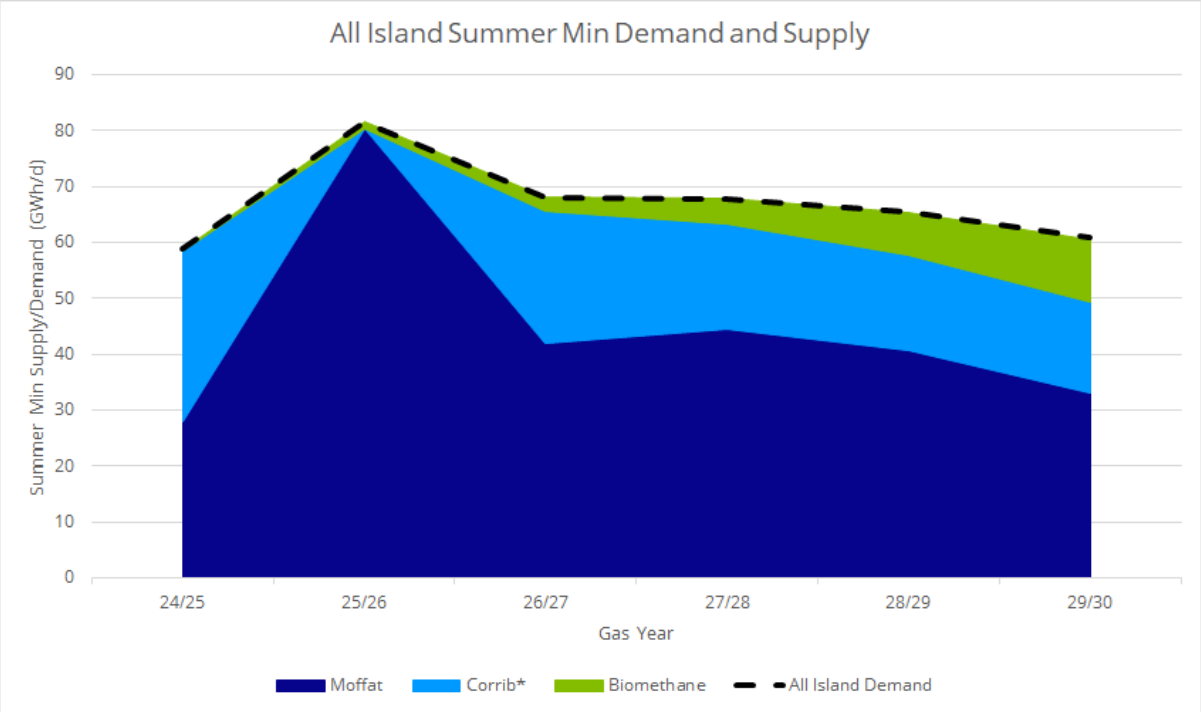


Figure 2: Island of Ireland Annual Demand and Supply

There are a number of other potentially relevant developments being currently progressed by project developers but currently no firm data regarding these projects is available to the TSOs, so their potential impact on the Island's supply position is not considered here. With imports from Moffat expected to make up the all-island supply deficit in all years, it is not envisaged that bi-directional capacity at Moffat will be required in the absence of developments that significantly alter the island's supply position.

Figure 3 presents the supply and demand profile on the summer minimum day based on the Gas Networks Ireland Network Development Plan 2024, supply and demand assumptions. In all years, ROI supplies do not exceed demand on the minimum day and gas imports via Moffat are required.



*Forecast supply from Corrib based on information provided by the gas producer onsite.

Figure 3: Island of Ireland Summer Min Day Demand and Supply

The Moffat IP Entry Point to the NI Network (i.e. the physical flow path through the Scotland to Northern Ireland Pipeline ("**SNIP**")) supplied 100% of Northern Ireland gas demand in 2024/25. This situation continuing in the short to medium term is increasingly unlikely as significant additional gas-fired power generation comes on to the NI gas network – imports to NI via the RoI gas system (physically via Moffat, the Gormanston IP and the South North Pipeline) are increasingly likely, as shown in **Figure 4** below.

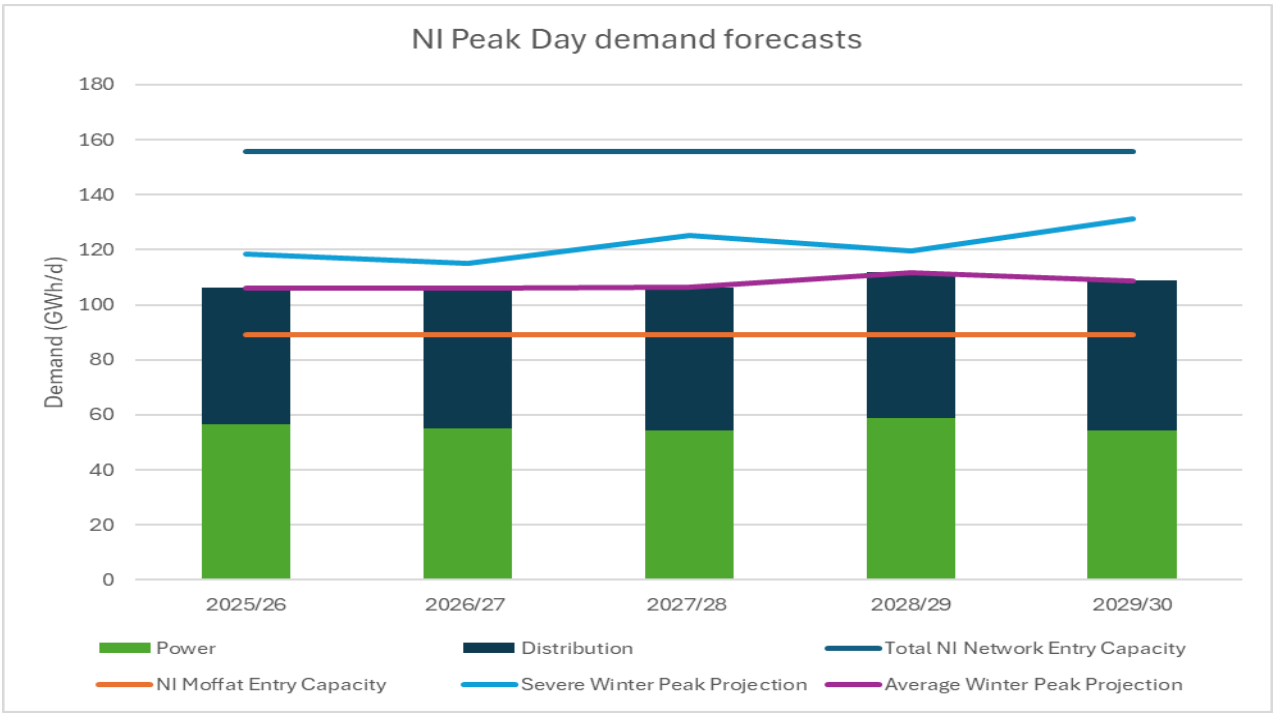


Figure 4: Northern Ireland Network Severe Winter Peak Day Demand Forecast- NI GTO 2025/26

Figure 5 outlines the supply and demand outlook for Northern Ireland over the next 5 years for the base scenario in the 2025/26 NI GTO.

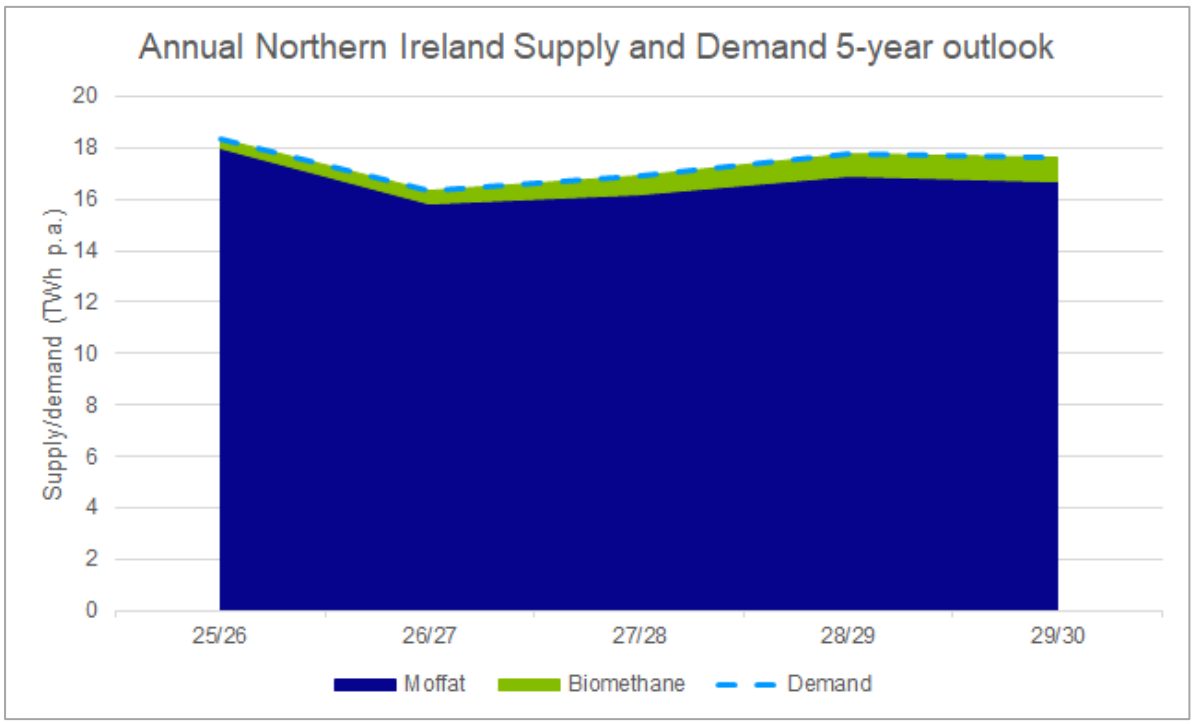


Figure 5: Northern Ireland demand and supply – NI GTO 2025/26 Base Scenario

The TSOs note that there are potential supply developments being currently progressed by project developers, including (amongst others):

- **Islandmagee Gas Storage Facility:** Islandmagee Energy Limited ("**IMEL**") holds the development rights to an underground salt cavern gas storage project located in Islandmagee, Co. Antrim.

- **Strategic Gas Emergency Reserve:** the Irish Government has tasked Gas Networks Ireland with developing a state-led Strategic Gas Emergency Reserve. The SGER will be delivered in the form of a Floating Storage and Regasification Unit (FSRU). This specialist ship stores liquefied natural gas (LNG) and converts it to natural gas when required in an emergency situation. This SGER project is currently in the design and approval phase, once all consents are secured, the terminal is built and commissioned the expected go-live operational date is 2030. The SGER will not be operated as a commercial entry point, is not expected to deliver gas to the network in standby operation and therefore does not affect the supply position on the island of Ireland.

The projects outlined above are included based on their inclusion in relevant outlook documents[3], or on the basis of firm policy decisions to advance their development. The TSOs recognise that additional projects may exist which could either enable or benefit from the provision of bi-directional capacity.

No indication of Final Investment Decision and/or potential operational commencement date is presently available for the above projects. Given that there is currently no firm data regarding these (or any other) projects, it is not possible to determine their potential impact on the supply position on the Island of Ireland.

Based on the current position and firm information available in the above analysis it is not foreseen that supply in the Republic of Ireland or Northern Ireland will exceed demand within the October 2030 timeline. Therefore, the current information does not suggest that bi-directional capacity at the Moffat IP within the period considered will be required by the market. This consultation presents an opportunity for market participants to present their views on this matter.

Project promoters are encouraged to identify any such projects by responding to this questionnaire, including details of anticipated timelines and any bi-directional capacity requirements. It should be noted that the granting of exemptions does not preclude the development of bi-directional capacity, and the TSOs remain committed to engaging with stakeholders to assess and facilitate such opportunities. All submissions relating to the

[3] The relevant outlook documents are the **Gas Networks Ireland Network Development Plan (NDP) 2024** and the **Northern Ireland Gas Transmission Outlook (NI GTO) 2025/26**.

provision of bi-directional capacity will be reviewed and shared with the Competent Authorities to ensure they are fully considered as part of the decision processes.

4. Economic impact on existing infrastructure

Indicative costs associated with the provision of bi-directional capacity at the Moffat Interconnection Point for the Ireland to GB flow path are detailed in **Section 6**. These costs are provided for illustrative purposes to demonstrate that enabling bi-directional capacity involves material infrastructure investment. Please note that costs relating to the Northern Ireland to GB flow path have not been developed at this stage.

Tariffs for bi-directional capacity would be determined in accordance with current processes applicable to each TSO, or the Capacity Allocation Management European Network Code (or European Tariff Network Code), depending upon which prevails at the time of any commitment.

5. Feasibility Studies

In 2019 GNI, with the support of funding from the Connecting Europe Facility, completed a comprehensive multi-disciplinary feasibility study, which assessed all aspects of the technical and economic feasibility in relation to bi-directional capacity from Ireland to GB via the Moffat Entry Point.

In designing this study, GNI took account of the key investments that were known to be (or likely to be) required to facilitate bi-directional capacity, namely,

- The integration of compressor stations (new or existing) and existing landfall stations to facilitate bi-directional capacity through the GNI transmission network;
- Network reinforcement through the paralleling of particular pipelines within GNI's network; and
- Investment in GNI's odorant system to ensure either un-odorised or de-odorised gas would flow into the GB transmission network, due to the fact that GNI's transmission network is currently odorised.

GNI split the study into distinct work packages, which in addition to project management and stakeholder consultation, examined two key aspects around the viability of bi-directional capacity at the Moffat Interconnection Point:

- The hydraulic and technical viability; and
- The economic viability.

5.1 Technical Feasibility

GNI concluded that bi-directional capacity at the Moffat Interconnection Point is hydraulically and technically viable.

Based on the network analysis and conceptual engineering studies that have been carried out, four possible design scenarios to facilitate bi-directional capacity were developed. Each would facilitate varying levels of bi-directional capacity. Depending on the level of bi-directional capacity sought, varying levels of ROI onshore transmission network reinforcements are required. The network reinforcement requirements associated with the design solution presented here are summarised as follows:

- A new compressor station at Gormanston;
- Reconfiguration of the existing compressor stations on the Southwest Scotland Onshore System (SWSOS) at Brighouse Bay and Beattock;
- Reconfiguration of existing installations on the National Gas Transmission system at Moffat; and

- Installation of a series of network odorant injection units required so that gas is odorised at distribution level and transmission interface points (NI & IoM) and will be un-odorised at transmission level in ROI.[4]

The above network reinforcements would enable up to 139 GWh/day of bi-directional capacity at Moffat.

5.2 Economic Feasibility

The economic viability of the project is driven by its contribution to societal welfare. That is, whether the societal benefits of the project outweigh the societal costs. As part of the studies conducted in 2019, GNI undertook a CBA to appraise this contribution. In line with ENTSOG and European Commission CBA guidance, GNI analysed the Net Present Value ("**NPV**") of costs and benefits over a time horizon of 20 years.

In the 2019 study, the societal benefits assumed a hypothetical LNG facility on the west coast of Ireland that may have led to over supply on certain days. However, since no such facility, nor any other facility which may prompt an oversupply on the Island of Ireland to is likely to be delivered by 1st October 2030, we have assumed no benefits in the current analysis.

The CBA results associated with the presented reinforcement scenario are shown in **Table 5-1**.

Table 5-1 Cost Benefit Analysis

139 GWh/day Scenario	Upfront investment CAPEX	Fixed annual OPEX (over 20 years)	Variable cost saving	NPV
	€338.2m	€15.7m	€0m	-€353.9m

A further benefit that was not evaluated is that the project would increase the probability that investment in storage or an LNG (or other indigenous) supply point would go ahead and therefore would indirectly contribute to the security of supply benefits that such a facility would create. Including these social benefits could potentially reduce the negative investment gap in all scenarios. However, this would be difficult to quantify without knowing the precise details of any potential supply side project.

Despite this previous negative assessment, market developments, including those driven by a changing geopolitical context (or new lower cost sources of gas in Ireland including LNG or storage) could mean that the minimum investment scenario becomes NPV positive. In light of such advances, a further assessment of the costs and benefits associated with bi-directional capacity from Ireland to Moffat would be required and the NPV of the other conceptual design scenarios would also need to be revisited.

[4] The existing gas network in Ireland currently transports odorised gas in both the transmission and distribution networks, but the GB transmission network cannot accept odorised gas.

6. Bi-Directional Capacity costs

Capex costs estimates:
The estimated upfront investment costs associated with the presented design solution to enable physical reverse flow on the Ireland to GB flow path at Moffat are shown in the following Table 6-2[5]. This reinforcement solution would enable 139 GWh/day bi-directional capacity at Moffat. These costs were developed by GNI, are indicative and an estimate of costs associated with the Northern Ireland to GB flow path has not been commissioned. We would anticipate the costs of enabling bi-directional capacity on that path to be lower, albeit still significant, due to a smaller scale project being required.

These are included for illustrative purposes only, and respondents should note that costs will differ if a new feasibility study was conducted now or if the Northern Ireland to GB flow path was being considered.

Table 6-2 Investment capex

Project Element	Investment estimate (€)
Gormanston Compressor	250,000,000
Brighouse Bay Compressor re-configuration	16,281,552
Beattock Compressor re-configuration	21,074,756
Moffat re-configuration	8,661,600
Odorant System	32,254,293
Additional capital costs	9,931,968
TOTAL	338.2m

[5] Note: €250m estimate based on 2025 GNI bottom-up estimate for a new compressor hall €98.5m. PRF conceptual design report assumes 2 compressor halls (assumed total €197m for 2 halls). An estimate of €53m has been included for construction of control room, air & N2 plant, boiler system, diesel storage, vent stack, pipework between existing landfall station/compressor station other station wide ancillary items i.e. electrical systems, and major civil works for entire site.

In the absence of developing a revised bottom up estimate in 2026, 20.3% inflation has been applied to original figures which reflects the Percentage Change from the equivalent estimates in the 2022 assessment as guided by Interactive Data Visualisations, CSO Ireland. In addition, a contingency estimate of 20% has been added to these costs developed in 2022.

OPEX cost estimate

Based on 4 existing gas turbine driven compressor trains, an estimate of c. €0.8m per annum is required for operational and maintenance costs, benchmarked off existing Opex costs at Beattock Compressor Station. See detail below for approximate costs based on Beattock CS.

Equipment	Forecasted Opex Cost (€)
Gas Turbine	320,184.35
Compressor	103,768.40
Gas Cooler	79,605.53
Oil Cooler	17,017.41
Exhaust (Upper & Lower)	25,495.90
Enclosure	43,321.42
Turbine Control System	2,824.77
Ancillaries	8,583.41
Air Intake	3,851.96
Total	**783,926**

In the event that any project emerges in the coming years which may lead to a requirement for bi-directional capacity, any decision to progress bi-directional capacity would be subject to further analysis, including full consideration of operational costs. This would extend to fuel gas costs or compression electricity costs related to the projected flows. Since the current analysis shows that no flows are likely to arise out to 2030, there is, therefore, no consideration of these costs in the current analysis.

7. Assessed Bi-Directional Capacity benefits

In summary, as outlined in **Section 3**, the analysis based on the Gas Networks Ireland Network Development Plan 2024 shows that, on the summer minimum day, domestic supply in the Republic of Ireland does not meet demand in any year, and gas imports via Moffat are therefore required in all foreseeable circumstances.

Similarly, the Moffat IP Entry Point to the NI Network (i.e. the physical flow path through the Scotland to Northern Ireland Pipeline ("SNIP")) supplied 100% of Northern Ireland gas demand in 2024/25. This situation may change somewhat as significant additional gas-fired power generation comes on to the NI gas network – additional imports to NI via the ROI gas system (physically via Moffat, the Gormanston IP and the South North Pipeline) are increasingly likely. This further underlines the expectation that bi-directional capacity from Northern Ireland will not be required over the period of the proposed exemption..

While there are a number of other potentially relevant developments being currently progressed by project developers, currently no firm data regarding these projects is available to the TSOs, so their potential impact on the Island's supply position is not considered here. With imports from Moffat expected to make up the all-island supply deficit in all years, it is not envisaged that bi-directional capacity at Moffat will be required in the absence of major developments that alter the island's supply position. Should such developments materialise, benefits to be reconsidered would include the likelihood that the project would increase the probability that a future ROI/NI supply point (storage, LNG or indigenous production) would go ahead and therefore this would indirectly contribute to the security of supply benefits that a new supply point would create. The potential security of supply benefit that the project might offer to provide to GB would also be examined.

It should be noted that even if an exemption is requested and subsequently granted, this does not preclude work being progressed to enable Bi-Directional Capacity beyond the expiry of that exemption. Interested parties can still progress a demand indication for Bi-Directional Capacity at a later date via the Incremental Capacity Process.

8. Summary

Forecasts of expected relevant demand and supply scenarios over the next five years are presented in **Section 3**. Based on this data, in the absence of developments that alter the island's supply position, it is anticipated that supply capacity will not exceed demand on the island of Ireland for any of the years considered. In all years, the requirement for imports of gas from Moffat to make up the deficit between indigenous supply capacity and demand exists. This analysis does not consider potential projects that may change this position, so the TSOs wish to consult the market in order to determine if a potential future market requirement exists for bi-directional capacity at Moffat.

If bi-directional capacity is to be implemented, more detailed analysis of the available capacity products, emergency considerations and associated tariffs will be required. It should be noted however that, as outlined in **Section 5.2** the design solutions analysed have significant associated costs which would need to be justified by societal welfare determined through CBA – and determined by the relevant authorities.

There are multiple documents which govern the transportation of gas between Great Britain, Ireland and Northern Ireland, which include agreements between the TSOs involved and agreements between the TSOs and Shippers. These are listed in Appendix B and if Bi-directional capacity was to be put in place at Moffat, these documents would need to be revised to ensure they accommodate the change. In order for TSOs to take investment decisions, it is assumed that bi-directional capacity would be made available on a firm basis and its availability would be harmonised initially with existing arrangements. It is expected that these arrangements will continue to conform with European Network Codes as retained in UK law.

This Market Assessment presents relevant information out to October 2030 for the benefit of potential respondents, and notwithstanding the outcome of this consultation and any subsequent security of supply analysis, the TSOs have committed to review the requirement for bi-directional capacity in line with the Security of Supply Risk Assessment publication, at least every four years.

Data corresponding to these scenarios will be employed in conducting the Risk Assessment as required under Article 7 of the Regulation (EU) 1938/2017 as applicable in the EU and as retained in UK law.

9. Next Steps & Timelines

Market participants are invited to respond to this Market Assessment by 22nd July 2026, indicating—on a non-binding basis—their interest in bi-directional capacity at Moffat.

Following on from this Market Assessment consultation, the TSOs will consider if 'credible' market demand(s) (i.e. that which the TSO's reasonably consider may alter the position of supply and demand so as to require Bi-Directional Capacity, most particularly within the maximum exemption period permissible) is expressed in response to this Market Assessment, and will engage with the relevant project promoters and the Competent Authorities and the Regulatory Authorities concerned (who shall be given sight of details in responses to the Market Assessment) as appropriate regarding next steps.

It should also be noted that given that the current exemptions from the requirement to enable Bi-Directional Capacity expires on the 28th of September 2026 and given the timelines involved in implementing Bi-Directional Capacity, it is highly likely that a further exemption will be sought. It should also be noted that even if an exemption is requested and subsequently granted, this does not preclude work being progressed to enable Bi-Directional Capacity beyond the expiry of that exemption and interested parties can still progress a demand indication for Bi-Directional Capacity at a later date via the Incremental Capacity Process.

Should you have any queries on any aspect of the process then please contact: Stephen O'Riordan (+353 87 906 7408; stephen.oriordan@gasnetworks.ie), or Ofordi Nabokei (+44 7734729774; ofordi.nabokei@nationalgas.com), or Adam McCullough (+44 2890 437580; adam.mccullough@mutual-energy.com)

APPENDIX A – Questionnaire

No.	Question	Answer
1.	Name of Company: Address:	
2	Do you broadly agree with the analysis contained within this document concerning the potential supply / demand situation on the island of Ireland out to 2029/30? If no, please provide details of your analysis. *(Please use separate sheet if necessary)*	YES/NO

No.	Question	Answer
3.	Is your company interested in reserving Bi-Directional capacity from **Northern Ireland to Great Britain** via the Moffat Interconnection Point?	YES/NO
4.	If the answer to Q3 is yes, please indicate subject to contract the volume and duration to which you would be prepared to commit. Required prior to 1st October 2030: a) Start date b) Volume (in tranches of 30, 000 kWh/day): c) Duration (in years): Required beyond to 1st October 2030: d) Start date e) Volume (in tranches of 30,000 kWh/day): f) Duration (in years):	(a) (b) (c) (d) (e) (f)
5.	Is your company interested in reserving physical reverse flow (Bi-Directional) capacity from **the Republic of Ireland to Great Britain** via the Moffat IP?	

No.	Question	Answer
6.	If the answer to Q5 is yes, please indicate subject to contract the volume and duration to which you would be prepared to commit. Required prior to 1st October 2030: a) Start date b) Volume (in tranches of 30.000KWh/day): c) Duration (in years): Required beyond to 1st October 2030: d) Start date e) Volume (in tranches of 30,000 kWh/day): f) Duration (in years):	(a) (b) (c) (d) (e) (f)
7.	Respondents answering YES to **Question 3 and/or Question 5** are asked to acknowledge that they may be required to contribute to the costs of carrying out any CBA of Bi-directional Capacity in the context of their requirements. Subject to acceptable terms and conditions are you willing to enter into a long-term contract which covers the indicated amount of capacity (in the previous question)?	YES/NO YES/NO

No.	Question	Answer
8.	Contact Person: Title: Date:	

APPENDIX B – Related Documents

Doc No	Document
1.	Code of Operations
2.	Uniform Network Code
3.	Moffat Interconnection Agreement
4.	Moffat Ancillary Agreement
5.	IT Systems