

**Email from Claire Walsh, British Gas Trading, with comments on the NI Single Gas Transmission Code High Level Approach Consultation**

**From:** Walsh, Claire [mailto:claire.walsh@centrica.com]

**Sent:** 30 November 2016 12:08

**To:** Andrew.Kelly@gasnetworks.ie; Stephen English <Stephen.English@mutual-energy.com>

**Subject:** RE: EXT NI Single Gas Transmission Code - High Level Approach Document Consultation

Dear Andrew, Stephen,

Further to the receipt of the CJV HL Approach Consultation British Gas Trading Ltd welcome the opportunity to respond to the approach and make the following comments:

- We support the development of a single harmonised gas transmission code for NI and the anticipated reduction in operational costs going forwards.
  - We would appreciate some transparency in terms of the budget for the project, noting that ultimately it is the Shippers who are funding this development
  - We would ask for some transparency from the CJV project in terms of the forecast operational (and hence transportation charge) savings and when the market will realise such savings.
  - Will the CJV be responsible for operational ownership and manage issues centrally? For efficiency purposes we assume so.
- We support moving away from the Align system & the anticipated improvements to the IT infrastructure & request timely user training & interface testing.
- We support the introduction of trade renomination processes.
- We note that the 10 month timetable is fairly aggressive for a GY17 implementation but support it's early implementation.
- We would suggest that it would seem appropriate to also review the PTL/GNI OV2 agreement which would provide an ideal opportunity to improve the renomination and constraint issues experienced in the market.
- What transparency will there be around the CJV? It would be useful to understand the interaction between the single code and code governance and how the rules can be modified effectively going forwards.
- We look forward to engaging closely with the project through its development.

We shall look forward to hearing from you in due course.

Kind regards,  
Claire

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