BGE(NI) Transmission comments on Proposed Modification 11 to the PTL Transportation Code

1. BGE(NI) Transmission understand that the purpose of Proposed Modification 11 to the PTL Transportation Code, proposed by Phoenix Natural Gas Ltd., is to amend the method in which Exit Point Tolerances (EPT) are calculated under the PTL Code.

2. BGE(NI) Transmission understand that the intention of the Modification is ensure that the EPT applied to a Shipper is based upon the Shippers individual Downstream Load Statement and that different EPT’s will be applied to multiple Shippers at Phoenix Exit Points 1 & 2 and Stranraer. We also understand that EPT’s will be recalculated on a 6-month basis upon receipt of Shippers revised Distribution Load Statements. We note that this will involve additional administration for the Transporter and will require systems modifications to GTMBS to reflect this.

3. BGE(NI) Transmission do not propose amending the BGE(Northern Ireland) Transportation Network Code at this time as multiple Shippers with different Downstream Load Statements at a single Exit Point is not currently an issue for the BGE(NI) Code. However, BGE(NI) Transmission will review the operation of this Modification when implemented by PTL.