BGE(NI) Comments on the Initial Modification Report on Code Modification No.9

BGE(NI) are pleased to submit comments on PTL Code Modification Proposal No. 9 including PTL’s Initial Modification Report, circulated on 5th May 2005. BGE(NI) are broadly in agreement with some of the comments made by PTL in the Initial Modification Report, however, we have not been party to the discussions over the past twelve months between PTL and Phoenix referred to in the Phoenix Code Modification proposal. BGE(NI) are committed to implementing arrangements to allow gas to flow between the Transmission and Distribution Systems in Northern Ireland in as seamless a manner as possible.

Section 1:

BGE(NI) note that there may be a requirement to have matching arrangements at the interface between the PTL/Phoenix transmission system and the Phoenix Distribution system. BGE(NI) would welcome the opportunity to participate in the development of any arrangements which may be put in place to facilitate such matching, as a similar requirement may be likely on the NWP when the supply competition is introduced to the NWP and SNP towns.

Section 2:

BGE(NI) agree that additional administration resources will be required to process Shipper requested changes to initial Allocations at a shared Exit Point on a daily basis. While the Codes in Northern Ireland do allow this, in practice such requests are infrequent. We understand that the Phoenix proposal is that this would be a daily occurrence and BGE(NI) feel consideration would need to be given as to where this activity should best be carried out.

Section 3:

BGE(NI) feel that the rules relating to capacity and supply restrictions should be clear to allow the Transporter to implement these rules in a timely fashion. While there will be regular interaction and close co-operation between the Transmission System operator and the Distribution System operator, both operators should be in a position to implement clear rules in the event of an emergency or restriction. BGE(NI) query whether the proposed modifications are necessary? After the introduction of supply competition, should PS Gas Suppliers ensure that interruptible services are not used to supply gas to end-users who cannot tolerate interruption?

Section 4:

BGE(NI) feel that there is merit in having the Flow Order leadtimes consistent in the upstream and downstream systems.
Section 6:

BGE(NI) feel that the suggestion made by PTL regarding modifying the Accession Agreement to allow a party with a Distribution Licence to accede to the code is worthy of consideration. However, the Codes would also require modification – ref. Clause 17.4.5 of the PTL Code.