

IME₃ Compliance for 2015

Nominations at IPs and Trade Nominations Business Rules for Industry Consultation

Version 1.0

3rd November 2015



Contents

1.	Introduction.....	3
2.	Relevant Context.....	3
3.	New Concepts	4
4.	New Terms	7
5.	Contents and Timing of IP Nominations	9
6.	Contents and Timing of IP Renominations.....	9
7.	Processing rules for IP Nominations and IP Renominations	10
8.	Rejection of IP Nominations and IP Renominations	10
9.	Revision of IP Nominations and IP Renominations	11
10.	Matching of IP Nominations and Renominations	11
11.	Trade Nominations	12
12.	Nominations and Renominations at Exit Points which are not IPs	13
13.	Transition Details	14
14.	Consultation Questions.....	15
15.	How to respond	16

1. Introduction

- 1.1. This document sets out the Business Rules for Nominations at Interconnection Points in the NI Regime, from 1st October 2015.
- 1.2. It is necessary for Northern Ireland to comply with EU Regulations, specifically the IME₃ Regulation EC 715/2009, and the Network Codes which have been/are being implemented as a consequence of that Regulation.
- 1.3. There are requirements concerning nominations at Interconnection Points (IPs) in the Balancing Code (EU 312/2014), the CAM Code (EU 984/2013) and the Interoperability Code (currently in Comitology).
- 1.4. The NI TSO's (PTL, BGE(NI) and BGTL) are introducing rules to cover the Nominations requirements of all of the above EU Codes at the same time.
- 1.5. These Business Rules therefore cover IP Entry Nominations and Renominations in relation to gas flow at Interconnection Points in the forward flow and virtual reverse flow directions, and Trade Nominations for gas trades between Shippers at the Northern Irish Balancing Point (NI BP). They describe the information which needs to be contained in Nominations/Renominations and the processing steps which the NI TSOs will apply in managing Shippers Nominations/Renominations, as well as relevant rules and timings.
- 1.6. Certain changes to the existing rules for exit nominations and renominations are also covered, in particular aligning the earliest/latest timings for submission with the EU compliant timings which are being implemented for IPs, and changes concerning interruptible exit nominations.
- 1.7. These Rules will be developed into a Code Modification Proposal, and so will be effective, if approved, from the start date specified in that Code Modification Proposal, which is likely to be 1st September 2015, to allow for the maximum lead time for the submission of Nominations (i.e. 30 days ahead of the Gas Flow Day).

2. Relevant Context

- 2.1. The following points are key elements of relevant context for these Business Rules:
 - a. Under CAM and the Interoperability code it is envisaged that TSOs handle nominations matching processes between themselves and there is no need for any Agent role in nominations. The NI TSOs have initiated discussions with the Moffat Agent as to its withdrawal from service from October 2015. A transition period is envisaged particularly for the nominations processes and there will be an overlapping period where the Moffat Agent processes nominations for certain Gas Flow Days whilst the 'new processes' commence for later Gas Flow Days.

- b. The introduction of an entry exit regime means that Shippers will be required to nominate separately at entry and exit points, rather than entry nominations being deemed to be equal to exit nominations;
- c. Existing references to Interruptible VRF Nominations at Exit Points in the NI Codes shall be removed, but it will still be possible for Shippers to buy VRF capacity at the Interconnection Points (as virtual exit points), and to make IP Nominations and IP Renominations in respect of that capacity in accordance with these Business Rules. VRF IP Capacity will be sold on an interruptible basis according to CAM rules in a day-ahead auction, and potentially via a within day over-nomination procedure. The NI TSOs are still determining whether or not a within day over-nomination procedure is also feasible;
- d. The NI TSOs intend to make functionality available to enable Shippers to notify the NI TSOs of gas trades that Shippers have made with each other at the NI Balancing Point from 1st October 2015. In order to give effect to such trades within the NI Network so that they count towards a Shipper's daily imbalance position, the functionality will simply verify that quantities and counterparties are matched at the NI BP. However the NI TSOs are not intended to deliver a trading platform or a balancing platform at this time.¹

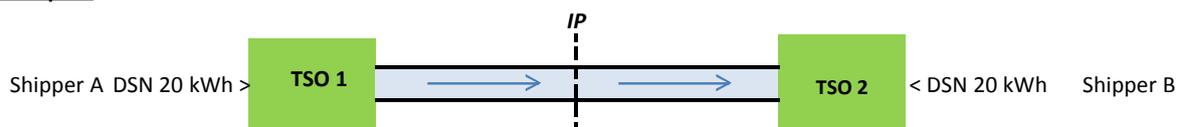
3. New Concepts

- 3.1. The CAM Code requires the Transporters on either side of an IP (the Adjacent Transporters) to provide a joint nomination procedure for bundled capacity, such that a Shipper can make a nomination for gas flow against a bundled capacity product using a single nomination. These rules therefore introduce the concept of a 'Single Sided' Nomination.
- 3.2. Where Shippers hold unbundled capacity at an IP, they can nominate gas flow against that capacity using a 'Double Sided' Nomination. This is referred to as Double Sided because in respect of the IP overall, the Shipper will need a counterparty on the other side of the IP to make a matching Nomination/Renomination. Therefore there will be two nominations, one to each of the Adjacent Transporters, in respect of the desired flow across the IP, as is current practice.
- 3.3. Double Sided Nominations will be required for each pair of counterparties. This means that Shippers who hold both bundled and unbundled capacity, or who have more than one counterparty for nominations against their unbundled capacity, will have multiple Nominations for a Gas Flow Day, in respect of the same IP.
- 3.4. The following diagram illustrates how Shippers may have both Single Sided Nominations and Double Sided Nominations, as well as in each case, one Nomination per Counterparty.

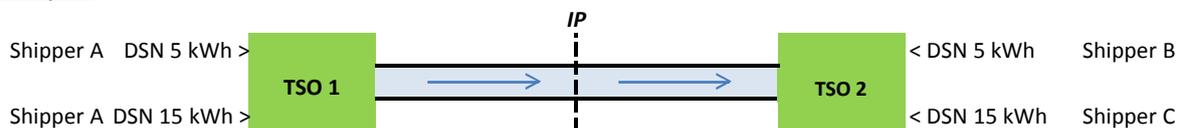
¹ The TSOs intend to apply an Interim Measures Approach, as defined in the Balancing Code, which provides for the ongoing use of Balancing Services and annual reporting as to the development of the trading market.

Nominations at IPs and Trade Nominations: Business Rules for Industry Consultation

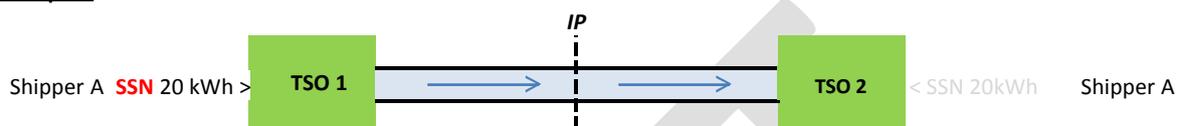
Example 1



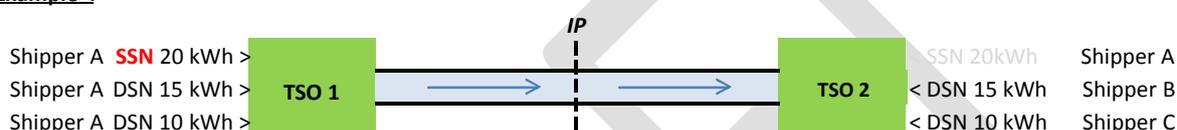
Example 2



Example 3

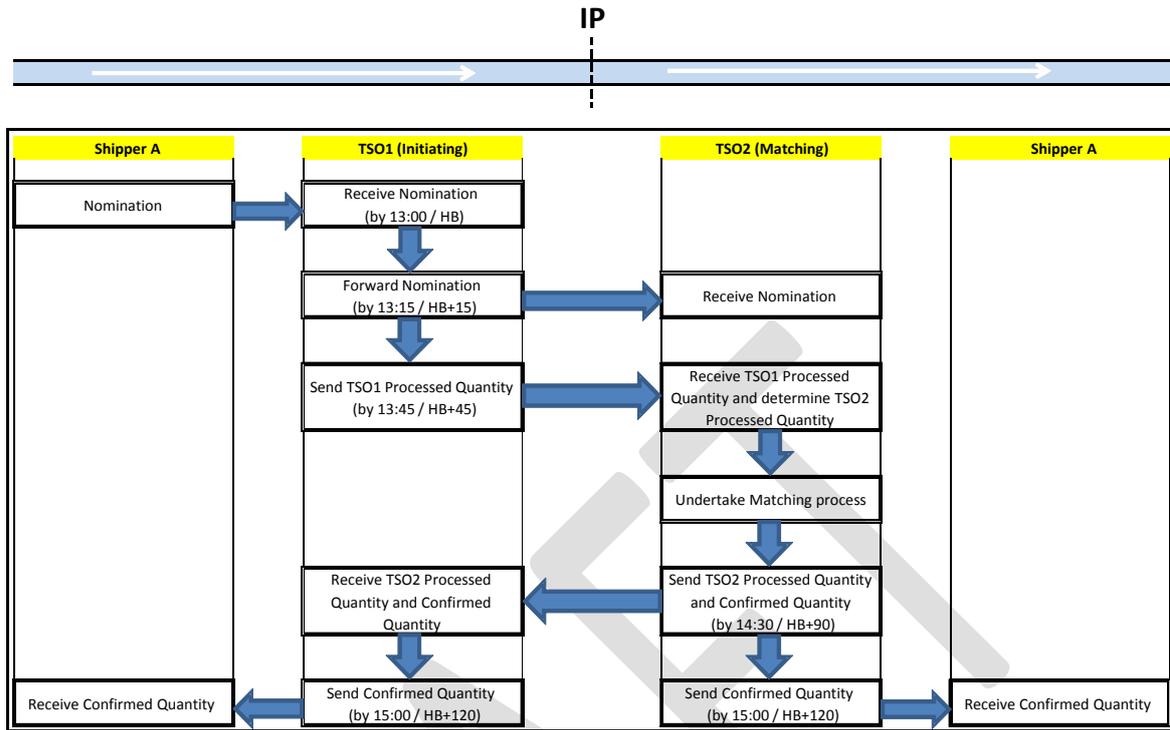


Example 4



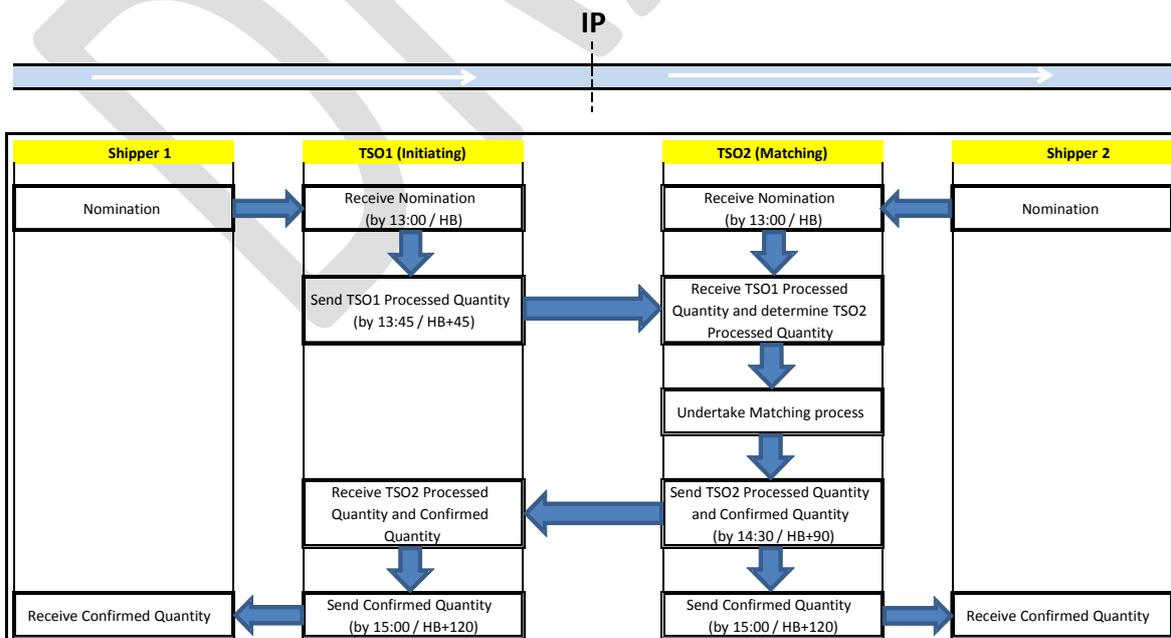
- 3.5. The Interoperability Code requires one of the Adjacent Transporters at an IP to act as matching party and the other as initiating party for Nominations and Renominations at that IP. The Initiating Transporter receives Single Sided Nominations and passes them to the Matching Transporter. The Initiating Transporter will also receive Double Sided Nominations for use of the unbundled capacity on its side of the IP from its Shippers.
- 3.6. Both Transporters will process Single Sided Nominations and Double Sided Nominations according to their own Code Rules, and the Initiating Transporter sends its results (Processed Quantities) to the Matching Transporter, which matches each Nomination and Renomination using an agreed matching rule.
- 3.7. The Matching Transporter then provides Confirmed Quantities back to the Initiating Transporter and to its own Shippers. The Initiating Transporter sends its Confirmed Quantities to its Shippers.
- 3.8. The following diagram shows the matching process for a Nomination for an example Shipper A holding bundled capacity:

A Single Sided Nomination – for a Bundled Capacity Product



3.9. The following diagram shows the matching process for example Shippers A and B both holding unbundled capacity on either side of the IP.

A Double Sided Nomination – for an Unbundled Capacity Product



- 3.10. The NI TSOs will publish which party is to take the role of Initiating Transporter and Matching Transporter at each IP on their websites, along with the relevant matching rule which will apply at each IP. Any proposed changes to the matching rule will be published for comment for at least 2 months prior to amendment.
- 3.11. The NI TSOs anticipate that for NI from 1st October 2015, the matching rule shall be the 'lesser of' rule, and comments are invited on this approach.

4. New Terms

The following terms are used in this document and are provided here to aid understanding. The NI TSOs may use different defined terms when developing the Codes' legal drafting.

'Adjacent Transporter' means the operator of a Transmission System connected to (or designated as connected to) the NI Network at an Interconnection Point and 'Adjacent Transporters' shall be construed as including the relevant NI TSO at that Interconnection Point ²;

'Confirmed Quantity' means the quantity of gas in respect of each Nomination or Renomination confirmed to a Shipper following the matching process;

'Confirmed Trade Quantity' means the Trade Notification Quantity in a confirmed Trade Nomination;

'Double Sided' refers to an IP Entry Nomination or IP Entry Renomination (or VRF IP Exit Nomination or VRF IP Exit Renomination) made in respect of unbundled capacity;

'IP Entry Nomination' means an IP Nomination submitted by a Shipper for a quantity of gas flow at an IP in the forward flow direction;

'IP Entry Renomination' means an IP Entry Nomination that revises an earlier IP Entry Nomination or IP Entry Renomination or a new IP Entry Nomination submitted after 15:00 on D-1;

'IP Nomination' refers to either an IP Entry Nomination or a VRF IP Exit Nomination;

'IP Renomination' means an IP Nomination that revises an earlier IP Nomination or IP Renomination or a new IP Nomination submitted after 15:00 on D-1;

² PTL is the relevant NI TSO for Moffat and BGE(NI) is the relevant NI TSO for South North. Although PTL's network is not directly physically connected to the National Grid NTS, PTL has arrangements in place with BGE(UK) which owns and operates the pipeline immediately downstream of Moffat in onshore Scotland connected to the NTS. These arrangements enable PTL to offer a transportation service to NI Shippers from the Moffat flange, and consequently enable the NI Shippers to commercially transact directly with GB Shippers. The arrangements were the result of a Treaty between the UK Government and the ROI Government and have been in place since 1996. It is the intention to maintain this arrangement for the purposes of implementation of the EU Codes so that the direct commercial linkage between the NBP and the NI hubs can be preserved.

'Initiating Transporter' means the Adjacent Transporter which initiates the matching process by sending the necessary data to the Matching Transporter;

'Matching Process' is the process of comparing and aligning Processed Quantities of gas for Shippers at both sides of an IP, which results in Confirmed Quantities for the Shippers;

'Matching Rule(s)' refers to the method(s) the Matching Transporter will apply in order to align pairs of counterparty Nominations which are received not matching each other³;

'Matching Transporter' means the Adjacent Transporter which performs the matching process and sends the results to the Initiating Transporter;

'Negative Implied Flow Rate' means in respect of a Renomination, where the outcome of the following calculation is a value less than zero:

$$\text{Renomination Value (kWh)} - \left(\frac{\text{Prevaling Confirmed Quantity}}{24} \right) \times \text{hours elapsed in gas day at Renomination effective time}$$

'NI Balancing Point' means a notional point within the NI Network at which gas may be traded between Shippers;

'Processed Quantity' means the quantity of gas determined by the NI TSOs as being approved in respect of each IP Nomination or IP Renomination following processing of IP Nominations or IP Renominations;

'Single Sided' means an IP Nomination or IP Renomination made in respect of bundled capacity;

'Trading Party' means a party who is not a Shipper but which is registered with the TSOs and acceded to the Codes for the purposes of making Trade Nominations;

'Trading Counterparty' means the Shipper or Trading Party which is the counterparty to a Trade Nomination submitted by a Shipper;

'Trade Nomination' means a nomination of a quantity of gas to be traded [transferred] to another Shipper at the NI Balancing Point;

'Trade Notification Quantity' means the quantity of gas which is the subject of a Trade Nomination;

'VRF IP Exit Nomination' means an IP Nomination submitted by a Shipper for a quantity of gas flow at an IP in the virtual reverse flow direction;

'VRF IP Exit Renomination' means an IP Nomination that revises an earlier VRF IP Exit Nomination or VRF IP Exit Renomination or a new VRF IP Exit Nomination submitted after 15:00 on D-1.

³ Matching rules could include, for example, 'lesser of', 'default to zero', 'greater of', or specify which side of the IP prevails (e.g. 'Northern Irish side Shippers Nominations prevail'). See also 3.11.

Other capitalised terms have the meanings given to them in the NI Codes

5. Contents and Timing of IP Nominations

- 5.1. Shippers may submit IP Nominations between the start of the 30th (thirtieth) Gas Flow Day prior to the Gas Flow Day and the nomination deadline, which shall be 13:00 on the preceding day (D-1).
- 5.2. If a Shipper submits no IP Nominations by 13:00 on D-1, it shall be deemed to have made an IP Nomination with nominated quantity of zero.
- 5.3. A Shippers IP Nomination shall specify the following information:
 - Identity of IP;
 - IP Nomination Type (i.e. Single Sided or Double Sided);
 - Direction of gas flow (i.e. Forward Flow or Virtual Reverse Flow)
 - Identity of Shipper;
 - Identity of Shipper's Counterparty;
 - [Start and end time of gas flow];
 - Gas Flow Day;
 - IP Nomination Quantity (kWh/d).
- 5.4. The earliest possible effective time for an IP Nomination will be 05:00 on Gas Flow Day D.
- 5.5. A Shipper must submit a separate IP Nomination per Counterparty, and separate IP Nominations relating to bundled capacity and unbundled capacity, which means that a Shipper may have multiple IP Nominations in respect of a given Gas Flow Day at an IP.

6. Contents and Timing of IP Renominations

- 6.1. Shippers may submit IP Renominations between 15:00 on D-1 and 02:00 on the Gas Flow Day D (i.e. 3 (three) hours prior to the end of the Gas Flow Day).
- 6.2. A Shippers IP Renomination shall specify the following information:
 - Identity of IP;
 - IP Renomination Type (i.e. Single Sided or Double Sided);
 - Direction of gas flow (i.e. Forward Flow or Virtual Reverse Flow)
 - Identity of Shipper;
 - Identity of Shipper's Counterparty;
 - [Start and end time of gas flow];
 - Gas Flow Day;

- IP Renomination Quantity (kWh/d).
- 6.3. The [earliest possible] effective time for an IP Renomination will be 2 (two) hours after the hour bar by which the IP Renomination was submitted.
- 6.4. A Shipper must submit a separate IP Renomination per Counterparty, and separate IP Renominations relating to bundled capacity and unbundled capacity, which means that a Shipper may have multiple IP Renominations in respect of a given Gas Flow Day at an IP.

7. Processing rules for IP Nominations and IP Renominations

- 7.1. The NI TSOs will determine Processed Quantities in accordance with this section for each of the IP Nominations and IP Renominations they receive, and may consequently reject or revise IP Nominations/Renominations in accordance with sections 8 and 9.
- 7.2. The NI TSOs will process Shippers IP Nominations using (at least) the checks set out below:
- Administrative (complete information, valid date, valid Shipper or Shipper's Agent etc)
 - For a Single Sided Nomination, that it refers to the same Shipper on each side of the IP;
 - Application of rules to enable overall compliance with upstream operational requirements⁴;

And in addition, in the case of IP Renominations:

- That the Nomination does not contain a Negative Implied Flow Rate;
- [That the effective time of the gas flow rate change is at least 2 hours after the hour bar by which the Renomination was submitted].

8. Rejection of IP Nominations and IP Renominations

- 8.1. The NI TSOs may reject a Shipper's IP Nomination and/or IP Renomination if it fails any of the checks referred to in section 7 and also:
- If, in respect of a Double Sided IP Nomination or IP Renomination, there is insufficient information available from the Adjacent Transporter to complete the Matching Process (i.e. where no counterparty nomination/renomination was submitted to the Adjacent Transporter);
- 8.2. Where the NI TSOs reject a Shipper's IP Nomination they will notify the Shipper by 15:00 on D-1.

⁴ As added to the PTL Code by Modification 24

- 8.3. Where the NI TSOs reject a Shipper's IP Renomination:
- a) they will notify the Shipper within 2 (two) hours of the hour bar by which the IP Renomination was submitted; and
 - b) the prevailing Confirmed Quantity for the previously accepted IP Nomination or IP Renomination will apply.

9. Revision of IP Nominations and IP Renominations

- 9.1. The NI TSOs may revise IP Nominations and IP Renominations in the following circumstances:

- Where necessary in order to maintain Northern Ireland's aggregate profiled requirements within the allowed boundaries of physical operation permitted at the relevant IP, in which case a Shippers IP Nomination and or IP Renomination may be revised up or down⁵;
- In an Exceptional Event which may include for example [a Constraint,][Capacity Shortfall or D-1 Predicted Capacity Shortfall][Gas Supply Shortfall], [and an Emergency]. [In an Exceptional Event revised IP Nominations or IP Renominations (in the form of (adjusted) Confirmed Quantities) will constitute a Flow Order];
- In the event of interruption of VRF IP Exit Interruptible Capacity, in which case the NI TSOs will carry out revisions of VRF IP Exit Nominations and VRF IP Exit Renominations in an order which reflects the EU requirements to interrupt 'in the order of contractual timestamp'⁶;

- 9.2. Where the NI TSOs have to revise a Shippers IP Nominations and/or IP Renominations, they will, in conjunction with the Adjacent Transporter, ensure that the Matching Process reflects the revised quantities and notify the Shipper by providing (adjusted) Confirmed Quantities. This will also apply if the Adjacent Transporter has to revise nominations.

10. Matching of IP Nominations and Renominations

- 10.1. The Adjacent TSOs will submit Processed Quantities to the Matching Process at the relevant Interconnection Point.
- 10.2. The Matching Process will be performed, and the relevant Matching Rule(s) will be applied, by the Matching Transporter.

⁵ In line with the principles added to the PTL Code in Modification 24

⁶ Precisely how this would operate will depend on whether the within-day over nomination procedure is offered as a means of selling VRF IP Exit Capacity

- 10.3. [The NI TSOs may choose to utilise a third party to provide certain elements of the Matching Process.]
- 10.4. In respect of IP Nominations, the Matching Process will result in Confirmed Quantities for each of the IP Nominations received and the NI TSOs will pass the Confirmed Quantities to the relevant Shippers by 15:00 on D-1.
- 10.5. In respect of IP Renominations the Matching Process will result in Confirmed Quantities for each of the IP Renominations received and the NI TSOs will pass the Confirmed Quantities to the relevant Shippers within 2 (two) hours of the hour bar after the IP Renomination was submitted.
- 10.6. The Matching Rule to be applied in Exceptional Events may vary from the Matching Rule to be applied in normal circumstances.

11. Trade Nominations

- 11.1. Shippers and Trading Parties may submit Trade Nominations, provided that they are registered to do so in advance, with the NI TSOs. For the purposes of this section, the term Shipper(s) includes Trading Part(y)ies.
- 11.2. A Shipper may submit Trade Nominations in order to notify the NI TSOs of a trade of gas between itself and a Trading Counterparty.
- 11.3. Trade Nominations may be submitted between the start of the 30th (thirtieth) Gas Flow Day prior to the Gas Flow Day and 02:00 on Gas Flow Day D.
- 11.4. A Trade Nomination shall specify:
 - The Gas Flow Day for which gas is transferred;
 - The Identity of the Shipper;
 - The Identify of the Trading Counterparty;
 - Whether the Trade Nomination is for an acquiring trade or a disposing trade; (i.e. whether the Shippers is buying or selling gas);
 - The Effective Time of the Trade;
 - The Trade Notification Quantity in kWh/d.
- 11.5. The Effective Time of the Trade may be either one or two hours from the next hour bar after the Trade Nomination was submitted, as specified by the Trading Parties[, or if unspecified by the Shipper, shall be one hour from the next hour bar after the Trade Nomination was submitted] .
- 11.6. The NI TSOs will process Trade Nominations normally within 30 minutes [and no later than 30 minutes before the Effective Time].

- 11.7. Trade Nominations which do not contain the required information shall be rejected.
- 11.8. The Trading Counterparty must submit a matching and opposite Trade Nomination.
- 11.9. Where Trade Nominations between counterparties are received which do not match each other both shall be rejected, and the NI TSOs will inform the parties of the rejection within the processing time defined above.
- 11.10. Shippers do not have to have made any nominations (entry or exit) in respect of a Gas Flow Day in order to submit a Trade Nomination.
- 11.11. Shippers may use [third parties] to submit Trade Nominations on their behalf.
- 11.12. Trade Nominations which are not rejected shall be [deemed to be] confirmed as at the end of the processing time.
- 11.13. Trade Nominations which are confirmed shall be allocated whole in accordance with the Allocations Business Rules (which will be published separately), and will count towards a Shipper's imbalance position in respect of the relevant Gas Flow Day.

12. Nominations and Renominations at Exit Points which are not IPs

- 12.1. Currently in the NI Codes, Shippers making a Nomination or Renomination in respect of an Exit Point are deemed to have a matching Nomination/Renomination at the Entry Point (PTL and BGE(NI) Codes section 2.2.5). This will no longer apply and instead Shippers will have to nominate separately at each Entry and Exit Point where they wish to flow gas. As a consequence, the current rules which provide for amendment of an (exit) Nomination or (exit) Renomination when there is a Moffat mismatch (PTL Code section 2.7 and 2.11) will no longer be appropriate and will be removed from the PTL Code.
- 12.2. The NI TSOs propose to align the timings for the provision of (exit) Nominations and (exit) Renominations with those for IP Nominations and IP Renominations (and the new Gas Flow Day). Therefore, in respect of non-IP Exit Points, with effect from 1st October 2015:
 - Shippers will be able to submit Nominations up to 30 days in advance of the Gas Flow Day (and the current provisions concerning submission of Nominations by the Wednesday before each week in Codes section 2.4 will be removed);
 - Shippers will be able to submit Nominations up to 13:00 on D-1 (instead of 08:00 on D-1);
 - A Nomination received between 13:00 and 15:00 on D-1 will be treated as a Renomination received at 15:00 D-1;
 - The latest time for submission of a Renomination will be 02:00 on D (instead of 01:00 on D-1);
 - The earliest effective time for Nominations will be 05:00 on D;

- [The earliest effective time for Renominations will be 2 (two) hours after the hour bar by which the Renomination was submitted (instead of the current 4 (four) hour effective time)];
- 12.3. In the Codes section 2.4A, Shippers may currently submit Interruptible VRF Nominations in respect of any Exit Point⁷. This will be modified as described further below:
- a. With the transition to an Entry-Exit model, the contract path model will no longer apply and VRF will only apply in respect of Moffat and South North IPs. The NI TSOs will therefore no longer need to address VRF flows on contract paths between themselves (in particular at Carrickfergus).
 - b. It will therefore be possible to remove references to VRF at Exit Points other than Moffat and South North;
- 12.4. Instead, the rules for VRF IP Exit Nominations at Moffat and South North (i.e. operating as Virtual Exit Points), will be simplified and adapted to comply with the EU requirements for IPs, in accordance with the preceding sections of this document on IP Nominations. Specifically in relation to other non-IP Exit points, Interruptible VRF Nominations (for non IP Exit Points) will no longer be included in the Codes;
- 12.5. The Codes section 2.2 currently permit Shippers to submit a Nomination in respect of an Interruptible Nominated Quantity, as a deemed application for a corresponding amount of Interruptible Capacity. This will no longer be possible, and instead the quantity by which a Nomination exceeds the firm Exit Capacity booked at an Exit Point will attract a charge for the capacity. The Utility Regulator will determine the charges.

13. Transition Details

- 13.1. The new rules for IP Nominations and IP Renominations will be effective for Gas Flow Days starting from 1st October 2015. Since Shippers may submit IP Nominations up to 30 days ahead of the Gas Flow Day, the TSOs intend that these rules should take effect from the 1st of September 2015. This means that:
- IP Nominations may be submitted in accordance with these rules for the Gas Flow Day commencing 05:00 on 1st October 2015, starting from 1st September 2015;
 - IP Renominations in respect of the Gas Flow Day commencing 05:00 1st October 2015 may be made from 15:00 on D-1 (i.e. 30th September 2015);

⁷ Currently, Shippers can make Interruptible VRF Nominations at all Exit Points on the PTL Network as a result of arrangements which were introduced to enable compliance with a VRF requirement at IPs within the point-to-point regime. VRF Nominations at physical exit points therefore reflected where a Shipper nominated to flow, for example, from South North to a PTL exit point, which would conceptually be delivered via a VRF flow at Carrickfergus. From October 2015, nominations for entry and exit will need to be made separately and exit point nominations will no longer need to relate to the specific contract path. It is therefore only at Interconnection Points (where there is still an EU obligation to enable virtual reverse flow) that VRF IP Exit Nominations will be required.

- PTL will continue to use the existing Moffat Agent matching service in respect of Shippers IP Entry Nominations for Gas Flow Days up to and including 30th September.
- 13.2. The new rules for Trade Nominations will be effective for Gas Flow Days starting from 1st October 2015. Since Shippers may submit Trade Nominations up to 30 days ahead of the Gas Flow Day, the TSOs intend that these rules should take effect from the 1st of September 2015. This means that:
- Trade Nominations in respect of Gas Flow Day commencing 05:00 on 1st October may first be submitted starting from 1st September 2015.
- 13.3. The new timings for (exit) Nominations and (exit) Renominations will be effective for Gas Flow Days starting from 1st October 2015. Since Shippers may submit (exit) Nominations up to 30 days ahead of the Gas Flow Day, the TSOs intend that these rules should take effect from the 1st of September 2015. This means that:
- (exit) Nominations may be submitted in accordance with these rules for the Gas Flow Day commencing 05:00 on 1st October 2015, starting from 1st September 2015;
 - (exit) Renominations in respect of the Gas Flow Day commencing 05:00 1st October 2015 may be made from 15:00 on D-1 (i.e. 30th September 2015);

14. Consultation Questions

Shippers and other interested parties are invited to give their views on any aspects of these Business Rules. In particular, the NI TSOs would particularly welcome views and comments on the following:

- i) the proposed steps for processing and matching IP Nominations and IP Renominations;
- ii) the application of the 'lesser of' matching rule;
- iii) the proposals for Trade Nominations;
- iv) the alignment of exit nominations timings with those for IPs;
- v) the proposed changes to interruptible exit nominations;
- vi) the proposals for transition of the arrangements;
- vii) any other questions or concerns about the approach.

Responses, and/or parts of responses, may be marked as confidential and will be treated accordingly.

15. How to respond

Shippers wishing to respond to this document are requested to provide their views on or by **28th November 2014**. Responses may be made in writing or by email, or directly to the TSOs.

Written responses should be provided to:

Stephen English

stephen.english@mutual-energy.com

Premier Transmission Limited
1st Floor
The Arena Building
85 Ormeau Road
Belfast
BT7 1SH

Avian Egan

aegan@bge.ie

BGE(Northern Ireland)
PO Box 51
Gasworks Road
Cork

DRAFT