

Mr Stephen English  
Gas Market Operator (NI),  
Fourth Floor,  
The Arena Building,  
85 Ormeau Road,  
Belfast,  
BT7 1SH

Ref: NET/G/TH/306

1 February 2021

Dear Stephen,

**RE : NI Network Gas Transmission Code Modification No 9 – Introduction of a Non-IP Entry Point and Update to the Arrangements for Stranraer**

Thank you for your submission of the Final Modification Report (FMR) in respect of the above named proposal, on 20 October 2020.

The purpose of the proposed modification is to facilitate the ongoing transportation of gas to Stranraer under the NI (Northern Ireland) Network Gas Transmission Code, including the associated booking of entry capacity by the Stranraer Shipper.

To this end, the proposed modification introduces a notional Non-IP (Interconnection Point) Entry Point into the NI Gas Transmission Network Code, along with a new section 27 to set out the particular arrangements for the Stranraer Shipper and how they interact with the Stranraer Interoperator Agreement. The proposed modification also covers consequential changes that are required throughout the code as well as provisions to ensure that other NI Shippers are not disadvantaged by the introduction of the Non-IP Entry Point.

**Authority review and conclusions**

The Utility Regulator has considered the information provided in the FMR. We note that two responses were received during the consultation period. One response was in support of the proposed modification. The other noted the importance of clarity of tariff arrangements and equitable treatment of shippers; potential for enhanced clarity with respect to the drafting regarding overrun charges; the timely disconnect between the Code and OS Scheme Arrangements and the commencement/ completion of parallel Licence/tariff consultations; as

well as some minor typos. It also sought clarification of whether underutilised capacity would always be justified against the 1 in 20 licence obligation.

We note that the points raised in the consultation responses were addressed in the FMR, and that some changes were made from the Initial Modification Report to enhance clarity of drafting and ensure consistency with the finalised Stranraer Interoperator Agreement.

We also note the consideration by the GMO NI of the impact of the proposed modification on the networks of the Designated Pipeline Operators, Adjacent Transporters and relevant NI Agreements. We note in particular the expectation that consequential changes to the SSO (Single System Operator Agreement) and the SOA (System Operator Agreement) between the Transporters will need to be made to refer to the Stranraer Interoperator Agreement.

We are content that the proposed modification would better facilitate the 'Relevant Objective' as it will ensure that there are arrangements for the transportation of gas to Stranraer under the NI Network Gas Transmission Code which are appropriate and do not adversely impact on other NI Shippers.

#### **Decision**

As provided in condition 2.4D.9(c) of the relevant licences we direct the Transporter to implement the modification as set out in FMR No 9 dated 20 October 2020. The modification shall become effective on 1 March 2021.

Yours sincerely,



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**Tanya Hedley**  
**Director of Networks**  
**For and on behalf of NIAUR**