

**Email from Kirsty Ingham, ESB, with comments on
Code Modification Proposal No.10**

From: Kirsty Ingham
Sent: 25 September 2020 18:28
To: GMO (Shipper Communications)
Subject: Mod No. 10 Arrangements for the ROI System Exit Point

Hi Stephen, Hi Joanne

Thanks for the clear and concise report, another simple problem with a complicated solution thanks to the frameworks we all operate within. Brief comments to the Mod report:

- The intention to charge GNI (UK) some of the costs associated with operations, leading to corresponding reductions for Shippers: we welcome costs being allocated where they are incurred and to the correct party. There should be as much transparency around this as possible, so that Shippers can see that parties are treated in a fair and equitable manner. In terms of determining appropriate methodologies, again transparency would be welcomed and at the least oversight by the RA
- Contingent Mods: we've got in a governance tangle over this with Ofgem in GB, with them insisting that one Mod in process must be approved and implemented in Code before another can alter the same sections. I assume in this case there is no proposal to change the legal text proposed in the Mod No. 7 legal text (but not yet approved)? UREGNI is just linking the two Mods together, but not formally? I don't want to chase down any rules or such like, as being less formalised works so far. More a word of caution I guess, to avoid getting tangled.

Regards
Kirsty

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