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Stephen English,
Gas Market Operator for Northern Ireland,
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7th December 2017

Dear Stephen,

Consultation on proposed modification to NI Network Gas Transmission Code

Thank you for the opportunity to respond to the above consultation. SGN Natural Gas understand the proposed modifications will facilitate compliance with the EU Tariff Network Code (EU 2017/460).

The Tariff Network Code requires that from 2019 onwards the Reserve Prices for transmission entry capacity to be allocated by auction must be published on or before 31 May each year. The current arrangements mean that network users would not have this information until the end of August each year. SGN Natural Gas agree the changes proposed by GMO Northern Ireland will benefit network users as they will gain certainty on the price they will pay for annual entry capacity in the following gas year.

While we appreciate the requirement to facilitate these changes by modifying the NI Network Gas Transmission Code, the requirement on DNO's to provide this information so far in advance of the gas year may impact on the accuracy, particularly where the network is in a growth phase such as the Gas to the West network. Many variables need to be considered when developing a draft Forecast Network Capacity Requirement and the further in advance this process is carried the more uncertainty there is around each variable.

SGN Natural Gas will endeavour to provide the Forecast Network Capacity Requirement in an accurate and timely manner. We also confirm the necessary arrangements will be in place to facilitate the requirements set out in the proposed code modifications.

Yours sincerely,



Chris Shine
Head of Finance and Regulation
SGN Natural Gas