

**Email from Kirsty Ingham, ESB, with comments on
Code Modification Proposal No.9**

From: Kirsty Ingham
Sent: 15 September 2020 16:29
To: GMO (Shipper Communications)
Subject: RE: OSOS Scheme and CMP Methodology Statement Consultation

Dear Joanne and Stephen

I hope you are both well and keeping safe.

Thanks for opportunity to comment to the OS Scheme and CMP Methodology Statement and also Modification proposal No. 9. Overall I would like to express appreciation for the clarity of the explanatory texts, especially in translating the complexity into plain English. In comparison to much of the documentation circulating in the regulatory sphere it is like a breath of fresh air, so thank you for taking the extra time and effort on this!

I don't have anything major for you in the below, a bit of pedantry in the detail and a couple of high level comments.

OS Scheme and CMP Methodology Statement

- No material comments, the housekeeping changes are understood and the quarterly auction is acceptable
- Strictly I think historical should be used instead of historic when looking back over general past performance (rather than extreme or memorable events) - but the meaning is understood!
- There are a few instances of the spaces between words being lost when doing the mark up (e.g. 11.2.2 Transporterin), which I am sure will pop up in the final review

Modification No. 9

- The tariff arrangements are alluded to several times: it will indeed be important to understand those and that there is equitable treatment of Shippers through the following set of consultations
- In connection with tariffs, the comment on p. 9 about overruns charges at 8 times daily, but that this would effectively be 8 times Moffat IP Entry annual reference price for the Stranraer Shipper needs some additional explanation (again following consultations are highlighted for this)
- There is a disconnect between these arrangements being in place from 1 Oct 2020 and the commencement/completion of the parallel tariff and licence consultations (dates unknown). These processes appear to sit with Utility Regulator and may have suffered delays due to the current Covid-19 work circumstances. It would be helpful to have the whole suite of changes understood and in effect simultaneously. It appears that the change to the legal text at 17.4.2 on the payable price, for instance, would be enacted without the PTL Licence containing the relevant tariff definition
- Its' appears to be a typo (e.g. 19.7.1 (b), 22.1.2) (should be its with no apostrophe)
- I may not have all the relevant info here as concerns the Stranraer Shipper, but my understanding is that DNs are required to book capacity to 1 in 20. I was wondering if this would mean the provisions around underutilisation of capacity and LTUIOLI would always end in justification for the capacity holding based on licence conditions. This would make the review process a bit hollow. Obviously if the booking level is covered in a licence

condition and that were to change, or my assumption is incorrect, then the measures could be useful.

Please get back to me if any points require clarification.

Best regards
Kirsty

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