

CadMay19

Date

13 May 2019

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Malcolm Montgomery

National Grid

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Dear Malcolm,

We welcome the opportunity to respond to the consultation on National Grid Gas's Formal Consultation on Capacity Methodologies and Statements.

Given that we responded to the preliminary consultation in February, we are disappointed that the concerns expressed then have not been addressed at this second stage. As a significant stakeholder, we would hope that any disagreement with the concerns raised would be responded to with a thorough explanation as to why they would not be incorporated. To date, no such response has been received from yourselves.

In summary, Cadent is of the opinion that requests for increases to Enduring levels of NTS Exit (Flat) Capacity made during the Annual Application Window place Users at a disadvantage as capacity can be substituted away without the Donor being given the opportunity to challenge.

Compare this to the situation where a PARCA Application is made and the potential Donor is allowed to challenge the substitution by itself raising a PARCA Application.

We believe that an anomaly exists which requires addressing as this potentially leaves the Gas Distribution Networks at risk of not meeting their 1-in-20 obligations following subsequent increases in Peak Day demand forecasts.

For more detail, please refer back to the Cadent response to the preliminary consultation.

This response is made on behalf of Cadent and can be published by National Grid.

If you have any further questions please do not hesitate to contact me using the details at the top of this letter.

Yours sincerely

By email

Gurvinder Dosanjh

Industry Codes Manager

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National Gas Emergency Service

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