Eni response to National Grid's Informal Consultation on Capacity Methodology Statements and Proposed Licence Changes.

Please find here following eni spa response to National Grid informal consultation for changes to the Licence and Capacity Methodology Statements.

Eni considers that the use of a PARCA is a suitable mechanism that allows the timely release of Incremental capacity at both Exit and Entry points attributing correctly the costs of planning and physical works to those system users interested in incremental capacity. Furthermore eni appreciates that this mechanism which has been so far used to increase capacity only at Exit points in the form of ARCA, is extended to Entry points.

In this respect, eni would propose to National Grid to consider a wider alignment of Entry and Exit regimes, with particular reference to capacity allocation procedures, with the aim of providing for an equal treatment of Entry and Exit Capacity Users.
In particular, it should be allowed also to Entry Capacity Users to apply for a Capacity Reduction of their long-term bookings, as it is currently possible only for Exit capacity users.

Entry Capacity Auction should be revised to incorporate a Capacity Reduction Application, so that shippers could be able to adjust their capacity bookings in light of any unexpected change to essential contractual terms (like e.g. new transmission charging conditions) and/or to their long-term capacity needs and also producers and storage developers could align their Entry Capacity financial commitments to delayed or changed investment needs.
The introduction of Entry Capacity Reduction application would improve system users' flexibility, consequently enabling the capacity regime to better reflect users' true capacity needs.

Kind regards,

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