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By email to: [europaenpolicy@nationalgrid.com](mailto:europaenpolicy@nationalgrid.com)

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Dear Chris

**Implementation of EU Regulation for Capacity Allocation  
Mechanisms (CAM): Preferred Choice of Joint Capacity Booking Platform**

Thank you for the opportunity to comment on National Grid's proposal to adopt use of the PRISMA capacity booking platform as part of the implementation of the Capacity Allocation Management network code.

Centrica is an existing user of PRISMA in NW Europe. Our experience of using PRISMA has generally been positive. Once individual TSOs implemented the processes allowing services at particular system points to be offered via PRISMA, delivery has been efficient and user friendly.

We believe that PRISMA would be a logical choice of a joint capacity booking platform for National Grid and its neighbouring network operators (i.e. the GB interconnectors). Nevertheless, we have identified some areas where we would like further clarification or action by National Grid to ensure that the joint capacity platform fully meets the needs of GB shippers. These are:

- The National Grid letter explains that PRISMA is a not-for-profit-company, with member TSOs as shareholders. We would welcome further clarification on how PRISMA will be funded and any costs incurred by National Grid controlled and managed.
- Implementation of CAM at the GB IPs is potentially complex. An outcome is needed that maximises capacity and flexibility for shippers: the capacity booking platform must be able to accommodate this and not be a constraint on the optimal solution.

- We are concerned that the January 2014 GTC for PRISMA provide too much scope for the introduction of charges for users in Article 4.5. If the intent is to allow PRISMA to recover the cost of items such as lost access tokens, this should be made clearer.
- We would like to see more concrete information from PRISMA and National Grid on how change management will work and minimum notice periods. PRISMA and National Grid should be able to implement changes resulting from EU Code changes efficiently, and part of that process should include well planned consultations that allow time for shipper's recommendations to be acted on before revised GTCs take effect.
- It should be clearer what constitutes a "minor change", given that PRISMA reserves the right to make minor changes without consulting shippers and considers that a change could be considered minor even if it requires a change to shipper's systems.

We look forward to National Grid informing shippers of the outcome of the open letter and the next steps for this part of the CAM implementation in GB.

Please contact me if you have any questions.

Yours sincerely,

Helen Stack  
Commercial Manager