

bookingplatform@acer.europa.eu

Agency for the Cooperation of Energy Regulators
TRG republike 3
1000 Ljubljana
Slovenia



www.nationalgrid.com

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National Grid Response to ACER consultation on selection of single capacity booking platforms at 'Mallnow' and GCP VIP.

Dear ACER colleagues,

National Grid Gas (NGG) welcomes ACER's consultation relating to the selection of a single capacity booking platform to be used at 'Mallnow' IP and 'GCP' VIP, and specifically the criteria to be used when deciding on the capacity booking platform.

NGG is the owner and operator of the gas National Transmission System (NTS) across Great Britain. As the System Operator (**SO**) for both gas and electricity in Great Britain, we are responsible for balancing supply and demand in the short term for the whole transmission system. We own and operate the Interconnector Points in the UK at Bacton (to Belgium and the Netherlands) and at Moffat (to Ireland and Northern Ireland).

Overall, we support the assessment being undertaken however note that a more rigorous study was undertaken only in September 2015 by Baringa on behalf of the EU NRAs and ACER¹. In order to most accurately gauge developments since this time, the same process and methodologies should be followed to ensure consistency and validity of approach.

In addition to the relative weighting and assessment of NC core and associated requirements, we support the assessment of additional criteria alongside, such as on availability, data security and helpdesk functions. However, if companies have only used one platform, analysis of the services provided may be better undertaken by a third party.

We consider two factors to be of most significant importance in the analysis: cost transparency and service level guarantees. In considering the operational costs, cost reflectivity must be the overriding principle to avoid cross subsidisation and to show true costs and value. Avoiding cross-subsidisation, means all consumers will pay the fair and appropriate price (whether indirect or directly), including the end consumer. Secondly, experience and service level guarantees are an important indicator of quality and consistency of service.

1

https://www.acer.europa.eu/en/Gas/Framework%20guidelines_and_network%20codes/Documents/Gas%20Capacity%20booking%20platforms%20assessment.pdf

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Registered Office: 1-3 Strand, London WC2N 5EH
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National Grid Electricity Transmission plc
Registered Office: 1-3 Strand, London WC2N 5EH
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For us at NGG, the decision to join PRISMA in 2014 was based upon these overriding principles combined with the range and quality of services provided, alongside system support for and engagement with users, combined with the synergies associated with future platform development activity.

If you would like to discuss any aspect of our response, please do not hesitate to get in touch with me either via email or by phone.

Yours sincerely,

By email

A large black rectangular redaction box covering the signature area.