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Jan Gascoigne  
National Grid  
NG House  
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Consultation on "The Entry  
Capacity Substitution  
Methodology Statement"

Dear Jan,

ExxonMobil Gas Marketing Europe Ltd (EMGME) welcomes the opportunity to respond to the consultation on the Entry Substitution Methodology Statement and is responding in its capacity of a shipper on the NTS.

At this time we support Option 1 in Table 1 of the consultation document, that is, the current proposal in the IECR (with a review next year). We are concerned at the level of change that is being introduced in the Entry Capacity Regime as we go into the winter period and the level of uncertainty that this introduces. We understand that National Grid has to introduce new measures to meet its licence obligations and, in principle, we support measures that make the best and most efficient use of capacity in the System, however, because this change is being introduced at the same time as many other flexibility changes there is a higher possibility of knock-on consequences that are not yet revealed.

For the reasons stated above we think that Option 1 is the most suitable option at this time because it seems to us to offer the least change in the near term and offer some stability going into the QSEC auction. We think it imperative that a complete industry-wide review of capacity substitution, trading and transfer is carried out as soon as the effects of these measures on the System are better appreciated.

If you have any questions regarding this response, please do not hesitate to contact me.

Yours sincerely,

Joy Chadwick

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