

13 August 2018

First Gas Ltd
Via Gas Industry Company

GTAC - Submission on Block 1 Outputs

1. The following brief comments are provided by the Major Gas Users Group on two of the suite of reports released by First Gas as part of the Block 1 materials, namely 9 Priority Rights and 8 Nominations.

9 Priority Rights

2. While we acknowledge that the need for priority rights to follow end user is diminished we are not completely comfortable that the approach taken has removed the problem. We suggest 3.23 could be further reinforced with the wording “..no legitimate **and demonstrable interest**” etc.

8 Nominations

3. The approach of use of an algorithm for mass market nominations is constructive. With the benefit of the workshops over 7-9th August we believe the increase in number of intraday cycles is also constructive in providing greater opportunity to adjust nominations to manage overrun/underrun.

Yours sincerely



Richard Hale/Len Houwers
Hale & Twomey Ltd/Arete Consulting Ltd
Secretariat for the Major Gas Users Group