

## Representation - Draft Modification Report UNC 0761

### Arrangements for Interconnectors with additional Storage capability

**Responses invited by: 5pm on 21 March 2022**

**To:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Lauren Jauss
<b>Organisation:</b>	RWE Supply & Trading GmbH
<b>Date of Representation:</b>	18 March 2022
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>a)</b> Positive <b>b)</b> Positive <b>d)</b> Positive
<b>Relevant Charging Methodology Objective:</b>	<b>a)</b> Positive <b>b)</b> Positive <b>c)</b> Positive

*The consultation is aimed at establishing if the statement provided by BEIS would cause you to change a view that you previously expressed, or to take a view that you had not previously considered.*

*Please note previous representations received will be carried forward should parties not wish to change their original representation.*

**Modification Panel Members have requested that Modification is re-issued to Consultation with the aim of establishing if the statement provided by BEIS would cause you to change a view that you previously expressed, or to take a view that you had not previously considered.**

We supported this Modification Proposal in our consultation response of 19 November 2021, and the use of implicit storage capabilities of interconnectors in principle. However, we agreed with the workgroup report that a legal review should be sought. Now that BEIS have confirmed that EU legislation prevails over the Gas Act, we believe that this is sufficient and we continue to support this modification.

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

We believe these arrangements could provide a valued service in otherwise unused capacity to help manage short term gas supply and demand variability. Whilst the estimated effective working gas volumes appear to be very small compared with existing storage facilities, the extremely fast churn rate could result in very high utilisation, with many multiples of the working gas volume effectively injected and withdrawn each year.

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

No comment

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

None

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

We are not aware of any reason why the legal text does not deliver the intent of the solution.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

We are not aware of any errors or omissions.

**Please provide below any additional analysis or information to support your representation**

No comment