Representation - Draft Modification Report UNC 0675

Enabling changes to the BBL Interconnection Agreement to facilitate physical reverse flow

Responses invited by: 5pm on 14 May 2019

To: enquiries@gasgovernance.co.uk

Representative:	Graham Jack
Organisation:	Centrica
Date of Representation:	10 th May 2019
Support or oppose implementation?	Support
Alternate preference:	
Relevant Objective:	d) Positive
	g) Positive

The consultation is aimed at establishing if the content/effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0xxx will be carried forward should parties not wish to change their original representation.

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

This facilitating Modification will support the future physical reverse flow of gas in the BBL Interconnector and will therefore be consistent with European objectives for promoting gas security of supply. Additionally, providing a new route for the export of gas will help to promote competition in gas supply.

Self-Governance Statement: Please provide your views on the self-governance statement.

As this is a facilitating Modification, self-governance is justified.

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

As soon as reasonably practicable.

Joint Office of Gas Transporters

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

None identified.

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

Not applicable to the UNC.

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.

None identified.

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