

Representation - Draft Modification Report UNC 0858S

Amendment to Network Entry Provision at Shell St Fergus Terminal

Responses invited by: 5pm on 19 October 2023

To: enquiries@gasgovernance.co.uk

Representative:	Phil Hobbins
Organisation:	National Gas Transmission
Date of Representation:	11 th October 2023
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

We agree with the Proposer’s assessment of how this Modification would better facilitate relevant objectives (a) “efficient and economic operation of the system” and (d) “securing of effective competition between relevant shippers”. Shell should be able to access an upper limit for Wobbe Index that is permitted by UK law and which other parties that deliver gas to the NTS already have in place. The Panel’s decision to send this Modification direct to consultation demonstrates its non-contentious nature.

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

We agree that this Modification should be self-governance.

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

As self-governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised. Implementation of the Modification would then enable NGT and Shell to execute the necessary contractual change to continue operation of the temporary limit on an enduring basis.

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?*

This is an 'enabling' Modification, therefore no UNC text is required.

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.*

N/A.

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

N/A.