

## Representation - Draft Modification Report UNC 0607

### Amendment to Gas Quality NTS Entry Specification at the St Fergus NSMP System Entry Point

Responses invited by: **5pm on 09 November 2017**

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

<b>Representative:</b>	Graham Jack
<b>Organisation:</b>	British Gas Trading Limited
<b>Date of Representation:</b>	9 <sup>th</sup> November 2017
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<p><b>a)</b> Positive</p> <p><b>d)</b> Positive</p> <p>(i) <i>between relevant shippers;</i></p> <p>(ii) <i>between relevant suppliers; and/or</i></p> <p>(iii) <i>between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.</i></p>

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

Implementation of this proposal will help to ensure that a significant volume of gas will not be economically prohibited from entering the NTS. A thorough workgroup assessment determined that the likelihood of much higher CO<sub>2</sub> gas entering the NTS, resulting from consequential amendments to the NSMP NEA, will be very small. Although there might be, on rare occasions, some impact on the operational efficiency of major offtakes close to St Fergus this has not been quantified. Weighing up these factors we conclude that the relevant objectives of the UNC will be enhanced by the implementation of the proposal.

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

*N/A Panel determined it should be Authority Direction*

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

The proposal should be implemented immediately to allow the relevant Network Entry Agreement to be amended.

**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.

**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**