

## Representation - Draft Modification Report UNC 0714

### Amendment to Network Entry Provision at Perenco Bacton terminal

**Responses invited by: 5pm on 12 June 2020**

**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>	Tracy Brogan
<b>Organisation:</b>	Neptune Energy
<b>Date of Representation:</b>	12/06/20
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<p>a) Efficient and Economic operation of the pipeline system:</p> <p><b>Positive</b></p> <p>The Modification enables additional volumes of gas to be facilitated through existing infrastructure.</p> <p>d) Securing of effective competition:</p> <p><b>Positive</b></p> <p>This objective is met by maximising available UKCS gas onto the NTS, increasing supply diversity which will ultimately make NBP more competitive.</p>

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

This Modification will enable gas – produced very reliably and with low carbon intensity – to enter the UK network, which would otherwise simply not be possible. The arrangements in place will ensure the National Grid terminal at Bacton remains GS(M)R compliant and that the risk to connected downstream parties is no greater than it is today. The potential benefits of increased volumes of domestically produced gas extend beyond infrastructure owners, from offshore to NTS, to include UK plc and consumers.

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

This is a temporary arrangement, for a defined period, therefore no further lead-time prior to implementation is deemed necessary.

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

Neptune Energy, on behalf of the Cygnus Joint Venture Partnership, will cover any costs incurred by National Grid in the preparation and provision of this temporary arrangement, to ensure robust operational arrangements are in place.

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

No legal text is proposed for this enabling Modification.

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: Considering that National Grid would require HSE approval before the associated Network Entry Agreement could be amended, should the governance of Modification 0714 remain as Authority Direction?*

Given confirmation by National Grid that HSE approval is necessary for this arrangement, Neptune Energy agree that Authority Direction is appropriate.

**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.*

No

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

This Modification has been amended significantly since original presentation. Stakeholders and Shippers views have been carefully considered and incorporated through this process, resulting in a pragmatic temporary arrangement which will increase domestic gas supplies to the UK without impacting downstream parties.