

Representation - Draft Modification Report UNC 0712S

Amending the oxygen content limit in the Network Entry Agreement (NEA) at the St Fergus SAGE plant

Responses invited by: **5pm on 19 March 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Phil Hobbins
Organisation:	National Grid NTS
Date of Representation:	6 th March 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

This proposal seeks a modest increase in the oxygen limit at the Ancala NTS entry point for reasons which the Proposer has clearly explained. We note that the limit requested is lower than other recent requests from LNG terminals and the BBL interconnector and that the actual increment to oxygen content delivered to the NTS is expected to normally be materially below the contractual limit that would apply following implementation. The analysis that we have produced for the Workgroup concerning the potential penetration of higher oxygen content gas into the NTS as a result of this Proposal has shown that the effect would not be material.

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

We support this Modification remaining as self-governance.

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

No particular lead-time is necessary because this is an enabling modification that would result in an amendment to the relevant Network Entry Provision between National Grid NTS and Ancala.

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

Minor works on site would be required but the costs are not expected to material.

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

Yes

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

Q1: Please provide clear views and supporting evidence on the self-governance status of this modification focusing, in particular, on whether this proposal is likely to have a material impact upon competition in the shipping, transportation or supply of gas.

The effects of this Proposal are unlikely to be material, given the analysis we have provided to the Workgroup and that other entry points have in recent years been granted higher levels of permitted oxygen content.

Q2: Respondents to provide a view as to whether or not this modification should be [re]designated as self-governance.

Self-governance is therefore supported.

Q3: Please provide your views on the self-governance status.

We agree with self-governance status.

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

No.