

Representation - Draft Modification Report UNC 0780S

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

Responses invited by: **5pm on 11 February 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Jeff Chandler
Organisation:	SSE
Date of Representation:	11/02/22
Support or oppose implementation?	Comments
Relevant Objective:	Positive
Relevant Charging Methodology Objective:	Not Applicable

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

A number of modifications have been implemented to allow greater content of CO₂ onto the NTS. In most cases this CO₂ is passed through customer appliances and vented to atmosphere.

In the case of gas storage the CO₂ can react within caverns and create Carbonic formations that can cause rapid corrosion of assets.

It would appear from the modification report that in this case the CO₂ does not extend to the gas Storage assets operated by SSE. However, we continue to monitor the situation in case other terminals increase CO₂ content and directly affect asset condition and therefore lifetime.

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

N/A

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

N/A

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

If corrosion of assets is accelerated then an economic assessment will need to be made assessing replacement or de-commissioning of those assets given they have been operated in one case since the 1970s.

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

N/A

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.*

Insert Text Here

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

Insert Text Here