

## Representation - Draft Modification Report UNC 0814 (Urgent)

### Temporary Access to the Enhanced Pressure Service and Increase to the Maximum NTS Exit Point Offtake Rate of the BBL interconnector

Responses invited by: **5pm on 01 August 2022**

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>	Gavin Steyn
<b>Organisation:</b>	SEFE Marketing & Trading Limited (prior company name: Gazprom Marketing & Trading Limited)
<b>Date of Representation:</b>	01.08.2022
<b>Support or oppose implementation?</b>	Oppose
<b>Relevant Objective:</b>	d) Negative
<b>Relevant Charging Methodology Objective:</b>	Not Applicable* <i>delete as appropriate</i>

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

In recent months shippers who have purchased capacity sold by Interconnector Limited from Bacton to Zeebrugge (forward flow) have encountered numerous occasions where flows have been impacted by off-specification gas, which has involved large quantities of solids being delivered at the Bacton terminal by NGG towards the Interconnector operated by Interconnector Ltd.

The reasoning, as we understand it, has been due to extremely high flows at Bacton towards both Interconnector Ltd and BBL, which resulted in solids being lifted and delivered into the filters of Interconnectors filters.

These instances have resulted in the curtailment of shipper's capacity resulting in a detrimental impact on Interconnector shippers at a time of volatile markets and high prices.

We would therefore be opposed to this urgent modification without analysis, investigation, and resolution by NGG of these solids issues before going ahead with an increase in the pressure at Bacton.

As a long-term shipper of Interconnector since 1998, this is not the first instance that we have seen when flows increase.

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

It would not seem a reasonable and prudent action risking further issues at Bacton until NGG can assure shippers that they have completed an assessment of the recent issues and found a robust temporary and/or permanent resolution to the recent problem of off-specification gas.

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

The cost to shippers as already mentioned to manage their portfolio's in the current volatile markets at short notice and for prolonged periods would be detrimental and not sustainable.

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

Insert Text Here

**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.*

Lack of any assessment by NGG, especially considering recent issues at Bacton.

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

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