

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:	Jeff Chandler
Organisation:	SSE
Date of Representation:	13 March 2020
Support or oppose implementation?	Comments
Relevant Objective:	d) None

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

The information provided from the Heat Maps indicates this particular change will not significantly affect the gas supplied to the Storage sites near Easington. Under all the 'Maximum Contractual' scenarios the predicted content is 100-300 ppm (.01-.03%). The modelling states that there is no material effect if Ancala flows at 100ppm and as the proposed increase is up to this level it is other supplies at existing limits that are presumably taking us into that range.

For the 'Average Actual' scenarios (which will be closer to what we would expect to see for extended periods) the levels are lower (40-80 ppm for high demand, and 80-120 ppm for low demand). The Low demand is probably more relevant during injection.

The general concern for SSE is that if more modifications are brought in at more entry points, then the average O2 content will creep up over time. Underground gas storage is classified as sensitive to higher levels of O2 due to increased risk of corrosion within wet gas systems.

The general consensus seems to be that a level of 10ppm (the Ten Year Statement level) will not be an issue in wet gas systems, therefore, as for other modifications, we would only support changes above this level with the proviso 'where the gas can be demonstrated not to flow to installations sensitive to higher levels of oxygen, e.g. underground storage systems'.

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

Insert Text Here

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

Insert Text Here

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

If we had to replace these assets, then this would require long outage periods and several multi million pound projects. Given the current market conditions for Gas Storage it is unlikely that these projects would be economically viable and would result in curtailment. In the short term there could also be issues with elemental sulphur causing rapid blockage of Coalescer Filters, which would affect availability to withdraw gas from storage.

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

Insert Text Here

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.

Insert Text Here

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

Insert Text Here

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

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.*

Insert Text Here

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

Insert Text Here