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Dear Julian

RE UNC Modification Proposal 0019 – Amendment of Network Entry Provisions at Conoco-Phillips sub-Terminal at Theddlethorpe to align with Transco’s 10 Year Statement

Thank you for the opportunity to comment on this Modification Proposal.

British Gas Trading (BGT) notes that this is the second Modification Proposal seeking to amend the parameters of gas accepted into Transco’s system at Conoco-Phillips sub Terminal. The previous Modification (Ref 681) was limited at that time by the specification contained within Transco’s 10 Year Statement. Now that the specifications within the Transco 10 Year Statement have been aligned with the Gas Safety (Management) Regulations, we believe that it is appropriate to amend the specification for gas accepted at Conoco-Phillips in line with this standard.

In common with a series of other proposals of a similar nature, the overall objective is to increase the volumes of gas, which may be accepted on to Transco’s network. This has benefits for continuity and security of supply.

The report raises a specific question on the potential impact upon CV shrinkage due to the reduction of the Wobbe index number. We understand that due to the nature and mix of the supplies at this point on the system, the effect is not thought to be significant. On this basis we do not believe that any special provision is necessary in addition to the existing incentive arrangement which Transco NTS SO are subject to. Should experience show that this is more significant than expected, it would seem appropriate to address this as part of the SO Incentive and sharing arrangements when these are reviewed.

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We are supportive of the implementation of this Modification Proposal.

Please contact me if you require any further information.

Yours sincerely,

Mike Young
Commercial Manager