



**Comments in respect of
Modification 0069: Amendment of Network Entry Provisions at the
European Interconnector sub-terminal at Bacton**

9 January 2006

The Association of Electricity Producers welcomes the opportunity to comment on this draft modification report. The Association offers broad support for this proposal.

The Association recognises that the current Wobbe and sulphur limits at the IUK entry point are somewhat out of step with those at other entry points and that revising these may allow additional gas to flow into the UK which would enhance security of supply.

We were however concerned that increasing sulphur limits in gas used for generation would increase sulphur emissions. Sulphur emissions at gas fired plant are controlled by limiting the sulphur content of the gas in the environmental permits. A brief survey of a few of our members revealed a wide range of sulphur limits. Some limits were set very close to the existing entry specification which may have led us to withhold our support for this proposal. However early dialogue with NG and The Environment Agency has developed a greater understanding of this issue, and given that permits are due to be reviewed during 2006 and that any applications to revise permits before this time will be managed by the Environment Agency given the wider context of enhancing security of supply has enabled us to offer support for this proposal.

We believe this modification provides an example of how consideration of draft proposals and issues at an early stage can lead to better developed proposals that more fully explore the consequences of such proposals and therefore enable respondents to make more informed comments. In this case early dialogue between NG, the Environment Agency, AEP and its Members led to an understanding of the issues beyond the initial draft modification proposal and a better developed proposal being raised that we are able to support. If these issues had not been explored until a later stage in the process it may not have been possible to fully address them during the consultation period and we may have had to withhold full support.

We consider there are important lessons to be learnt from this proposal, in particular when issues can also require input from agencies not involved in the gas industry on a day-to-day basis.