

Representation for UNC modification. 069

"Amendment of Network Entry Provisions at the European Interconnector sub-terminal at Bacton"

Date of Communication: 06/01/06
External Contact: John Costa (EDF Energy Plc)
Slant: Support
Strictly Confidential: No

Dear Julian

EDF Energy welcomes the opportunity to respond to modification 069 "Amendment of Network Entry Provisions at the European Interconnector sub-terminal at Bacton". We believe this modification will benefit the relevant objectives of the Gas Act and therefore support its implementation.

Changing the Network Entry Provisions (NEP) at the Bacton Interconnector Terminal (IUK) by increasing the sulphur and Wobbe limits will bring the IUK in line with European gas specifications and potentially allow greater volumes of gas to enter the UK from the continent thereby enhancing security of supply. We recognise the increase in sulphur and Wobbe Index levels are not significant and will still be within Gas Safety Management Regulations (GSMR) limits. We also agree with the analysis in the draft modification report which states that the incremental increase in emissions from the increase in sulphur limits will be minimal at gas-fired power stations.

EDF Energy also welcomes the early discussion of these issues with the Environment Agency (EA) and their indication that there is no general requirement to set sulphur quality standards for natural gas from the NTS. However, we wonder whether further changes to NEPs will be required when the two new gas interconnectors come on stream in the next few years bringing higher calorific gas from Norway and Holland to Easington and Bacton terminals respectively. It is important to include the impact of these new sources of imported gas in the DTI's Gas Quality Specification consultation process¹ on both domestic and large industrial users such as CCGTs and understand the EA's view on whether gas quality standards will be needed on gas from the NTS at that stage.

We hope our comments have been useful but please contact me on the number below if you wish to discuss further.

Regards

John Costa

¹ Future arrangements for Great Britain's Gas Quality Specifications – DTI consultation paper 30 December 2005

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