

Representation

Draft Modification Report

0355 - Alignment of CV and Wobbe Limits at NTS System Entry Points

Consultation close out date: 08 April 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: National Grid Transmission
Representative: Phil Lucas
Date of Representation: 5 April 2011

Do you support or oppose implementation?

Support.

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

As proposer, National Grid Transmission (NGT) supports implementation of this Proposal which seeks to facilitate changes to gas quality parameters permitted at a number of NTS System Entry Points. This Proposal represents a co-ordinated and more efficient approach to changes previously sought on an individual basis (via stand-alone Modification Proposals) for a number of other Delivery Facility Operators (DFOs). Analysis presented to the industry has forecast that adoption of the proposed limits by DFOs would have no material adverse consequences for CV shrinkage. Enabling increased alignment with GS(M)R specified gas entry quality limits would ensure consistency with parameters available to any new NTS Entry Connection.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

We do not believe that there are any new or additional issues that need to be recorded in the Modification Report.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

Yes. We believe that implementation is unlikely to have a material effect upon the parties and processes detailed within the self governance criteria and is unlikely to discriminate between the relevant parties to the UNC.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe that implementation of this Proposal would only better facilitate competition between shippers where a consequential change to gas quality terms is reflected in individual Network Entry Provisions. We also believe that this co-ordinated approach to facilitating change to gas quality parameters is consistent with the promotion of efficiency in the implementation of the UNC.

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

There are no specific costs that would be incurred by NGT in the event of implementation of this Proposal. As highlighted above, analysis has demonstrated that where the proposed limits are translated into individual agreements with the relevant DFOs there are unlikely to be any material adverse implications for CV shrinkage.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

There is no specific lead time requirement for implementation and therefore subject to the appropriate direction from the Modification Panel, implementation can be achieved as soon as is reasonably practicable subject to any requirements detailed in section 9.7.2 of the UNC Modification Rules.

Legal Text:

Please note that legal text is not required in support of this modification as no changes to the Uniform Network Code are required should the modification be implemented.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

There are no further aspects that we wish to be taken into account.