

## Representation

### Draft Modification Report

#### 0363 - Commercial Arrangements for NTS Commingling Facilities

**Consultation close out date:** 12 September 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** **SSE**  
**Representative:** Jeff Chandler  
**Date of Representation:** 09 Sep 2011

#### Do you support or oppose implementation?

Support *delete as appropriate*

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

SSE believes that this mod will provide Users with an alternative method of connection to the NTS. It is considered that this model may be particularly suited to smaller scale connections of unconventional gas sources, where an upstream processing solution is not economical. This will help develop "green gas" and unconventional gas opportunities, helping the UK to achieve higher levels of gas supply and therefore security of supply than otherwise would have been the case.

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

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

SSE believes that the Relevant Objectives will be improved as described in section 4 of the Workgroup Report.

#### Impacts and Costs:

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

None

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**Implementation:**

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

SSE agrees with section 6 of the Workgroup Report for implementation on 1 Oct 2012.

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

yes

**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.*

no