

Representation

Draft Modification Report

0363V - Commercial Arrangements for NTS Commingling Facilities

Consultation close out date: 04 November 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: **Scotland & Southern Gas Networks (SGN)**

Representative: Erika Melén

Date of Representation: 4th November 2011

Do you support or oppose implementation?

Comments

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

SGN wish to offer comments only in response to this modification. SGN acknowledges and supports new entry connections into the gas networks both for security of supply and environmental reasons.

We do wish to emphasise that this is one possible solution which can be utilised in order for unconventional gas sources to meet entry requirements and so should not hinder other solutions (both commercial and legislative/regulatory) being progressed.

It is also important to note that this solution has been developed for one specific entry point on the transmission system and so should not be utilised as precedence for any potential subsequent modifications for the distribution network. This also applies to the current work carried out under MOD391 to develop a charging structure for DN Entry which should be considered in separation from this proposal.

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

No

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Efficient discharge of the licensee's obligations: SGN agree that by introducing this concept into the UNC it facilitates non-discriminatory arrangements for any shipper wishing to enter gas into the national transmission system.

Securing effective competition: SGN agree that this modification and appropriately allocated costs may facilitate effective competition for unconventional gas supplies entering the UK supply.

Impacts and Costs:

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

None

Implementation:

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

None

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