

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: WWU
Representative: Simon Trivella
Date of Representation: 12 September 2011

Do you support or oppose implementation?

Comments

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

WWU fully recognise the drivers and intent behind this proposal, which has been intentionally constructed to deal with connection points which are only linked to the National Grid Transmission system.

The business rules and legal text capture the requirements within the proposal and deal with the anticipated simultaneous exit and entry gas flow anticipated. No proximity rules exist in the proposal as it was felt that project economics would be a natural constraint, thereby any proximity of entry and exit points was unnecessary. WWU accept this may be true for NTS connections but would stress that the absence of any proximity guidelines would unlikely to be appropriate should these NTS type provisions ultimately extend to GDN networks through any subsequent proposal.

For example, should this to be extended to GDNs, a situation could arise where the connecting party wished to take the gas out of an IP pipeline and inject it into an MP pipeline. This could pose problems for the GDN in taking the gas into the MP system at times of low demand and could potentially join two parts of the system that were separate legs leading to issues with Network Operations. While proximity issues may not be a concern for NTS co-mingling points. Should any subsequent proposal be raised including GDNs in this type of commingling arrangement, this is one additional area that would need consideration.

0363

Representation

12 September 2011

Version 1

Page 1 of 2

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0363

Representation

12 September 2011

Version 1

Page 2 of 2

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