

Representation

Draft Modification Report

0401S: Amendments to the provisions for agreeing pressures at the Offtakes from the National Transmission System to Distribution Networks

Consultation close out date: 30 March 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: Scotland & Southern Gas Networks

Representative: Erika Melén

Date of Representation: 30 March 2012

Do you support or oppose implementation?

Not in Support

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

SGN cannot support this modification to the UNC as we do not feel that it would offer any measurable benefits.

Introducing the concept of Significant sites to reduce the number of NTS Offtakes to take part in the daily "agreed pressures" process does not offer any benefits in reducing the administrative burden for our control room.

SGN do not support the introduction of a new minimum pressure into the UNC for non-significant sites which the proposal seeks to set as the lesser of 38 barg or the assured pressure. This would mean that any NTS Offtake not defined as significant would experience reduced pressure at its inlet. The reduction in available pressure would reduce our operating capability below that of our current planning parameters and would have a negative impact on the operation of our networks; this would then require us to then define the majority of offtakes as significant.

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

No

Self Governance Statement:

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

0401S

Representation

16 February 2012

Version 1.0

Page 1 of 2

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Yes

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We do not agree that adding this extra complexity into the code will offer any measurable benefits and so does not better facilitate Relevant Objectives a) or b) in terms of efficient operation of the pipeline systems

Impacts and Costs:

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

Implementation of this modification could have a negative impact on the operation of our networks due to the "lesser of" rule applied to pressures for non-significant offtakes.

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