

## Representation

### Modification Proposal

#### 0464 - Alternative LNG supply to the Scottish Independent Networks (SINs)

**Consultation close out date:** 08 October 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** British Gas  
**Representative:** Andrew Margan  
**Date of Representation:** 08 October 2013

#### Do you support or oppose implementation?

Support

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

British Gas is concerned that a single point of failure has been allowed in the gas supply chain for the Scottish Independent Networks (SINs), Thurso (LT), Oban (LO), Wick (LW) and Campbeltown (LC).

It would be unacceptable to leave customers without gas especially during the cold winter months. We therefore support the changes as it enables changes to the industry arrangements to diversify the LNG supply sources to SINs.

#### 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?*

As the proposal allows for more diverse supplies of LNG to be made available to the SINs, we believe this proposal better facilitates the Transporter's relevant objective c) regarding the efficient discharge of their licensee obligations.

#### Impacts and Costs:

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

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None identified

**Implementation:**

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

No impact

**Legal Text:**

*Are you satisfied that the suggested legal text (provided by Scotia Gas Networks and published alongside the Modification Proposal) will deliver the intent of the modification?*

No issues identified

**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.*

Separate to the modification British Gas believes it is important for the Transporters to publish further information regarding the anticipated problem with the Avonmouth facility and for the Transporters to confirm what is being done to address it.