

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: **National Grid NTS**
Representative: Fergus Healy
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.

National Grid NTS recognises that the primary driver of this modification for SGN is to provide a contingency process for the SINs were Avonmouth to become unavailable. We further recognise that the use of the LDZ System Entry Point process may lend itself, at short notice and for a period of time, to such a contingency process. As such we support this proposal.

However National Grid NTS would also support further discussions with the industry to establish whether this proposed "urgent" solution is the most appropriate for the longer term particularly as it is unclear whether the use of the LDZ system entry point processes has an implication for Flow Weighted Average CVs or the Energy Balance, manifesting itself as an impact on Shrinkage.

Whilst National Grid NTS is unsure as to the longer term impact of classifying the SINs as LDZ System Entry Points, we believe that changes such as those proposed would normally be developed through the UNC Modification Workgroup process to ensure a thorough review of potential impacts. We are concerned that having not been discussed at Workgroup this proposal may have unforeseen issues over the medium or longer term and we would therefore support a review of this change if the proposal were to be implemented.

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?

N/A

Impacts and Costs:

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

N/A

Implementation:

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

As the modification seeks to utilise existing processes National Grid NTS believes that it can be implemented soon after an Authority decision is received. However National Grid NTS notes that the modification states that the SINS may be LDZ System Entry Points, as such a request must be made to set them up on National Grid NTS's IT systems and a lead time will be required to complete this.

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?

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