

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: Scotland & Southern Gas Networks

Representative: Erika Melén

Date of Representation: 4th October 2013

Do you support or oppose implementation?

Support

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

As proposers of UNC Modification 464 we are supportive of the change being made to the UNC to allow alternative LNG sourcing for the SINs.

As outlined in the modification LNG is currently sourced from Avonmouth which is the sole facility in the UK with tanker-loading facilities. During the spring and summer of 2013 engineering issues with Avonmouth required SGN to rely on stored LNG which, although sustainable during the summer season, would quickly be depleted should the issues with Avonmouth arise again during winter. As our key priority is to ensure our customers stay safe and warm SGN has raised this modification to ensure that, should any further issue arise with Avonmouth, that adequate contingency arrangements are in place.

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?

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Version 1.0

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As stated within the modification we believe that this modification will better facilitate Relevant Objective c) in reference to our Licence Obligations to ensure safe and secure operation of the network through security of supply.

Impacts and Costs:

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

Additional costs associated with the utilisation of the Zeebrugge LNG facility would be incurred by SGN. Some existing costs associated with freight may be offset with the use of the Zeebrugge facility.

Implementation:

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

As the modification is implementing contingency arrangements bearing no immediate change to processes (unless they are required) the modification can be implemented as soon as an Authority decision is received.

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