

## Representation - Draft Modification Report 0525 Enabling EU Compliant Interconnection Agreements

Responses invited by: **09 July 2015**

<b>Representative:</b>	Joel Martin
<b>Organisation:</b>	SGN
<b>Date of Representation:</b>	08/07/15
<b>Support or oppose implementation?</b>	Support.
<b>Relevant Objective:</b>	<b>g)</b> Positive

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

SGN owns and operates the Stranraer LDZ which is supplied with gas from the National Grid Transmission Offtake at Moffat via the Premier Transmission line. SGN books NTS Exit Capacity at the notional Stranraer NTS offtake point and operates as a licenced gas Shipper on the PTL network under terms detailed in the PTL Network Code. The Gas Act 1986 (Exemption) (No. 2) Order 2005 provides exemption to SGN from certain shipping arrangements associated with the conveyance of gas to the Stranraer LDZ including the booking of capacity on the PTL transmission line.

The Stranraer LDZ is included within the GB Total System and as such the gas supplied to the LDZ is accounted for in the same manner as any other LDZ in GB, the only difference being that SGN are required additionally to book capacity on the PTL transmission pipeline. Modification 0525 specifies that the arrangements which are required to be implemented to ensure the EU Code provisions are met do not apply to Stranraer LDZ as Stranraer is a DN Offtake.

SGN have been involved in constructive discussions with NGG, PTL and GNI to ensure the Stranraer LDZ commercial arrangements continue to be satisfied and that NGG, PTL and GNI's requirements under the EU codes are met, whilst at the same time ensuring that a double count of the gas volumes flowing into the Stranraer LDZ does not occur. SGN are confident that the systems and processes both NGG and PTL have agreed upon will ensure this does not occur.

### Implementation: *What lead-time do you wish to see prior to implementation and why?*

SGN agree with a 1 October 2015 implementation date.

### Impacts and Costs: *What analysis, development and ongoing costs would you face?*

No additional costs have been identified with the implementation of this proposal.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

No.

**Please provide below any additional analysis or information to support your representation**

None.