Representation - Draft Modification Report 0581S

Amending the Oxygen content limit specified in the Network Entry Agreements at Grain LNG

Responses invited by: 5pm 13 May 2016

To: enquiries@gasgovernance.co.uk

Representative:	Charles Ruffell
Organisation:	RWE Supply and Trading GmbH
Date of Representation:	13th May, 2016
Support or oppose implementation?	Qualified Support
Relevant Objective:	**d) (i)** Positive **d) (ii)** Positive **d) (iii)** None

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

This is a modification that seeks to enable an increase in the permitted Oxygen limit under the Grain LNG NEAs. We agree that this should allow more gas to be delivered into the GB market as it will allow higher Oxygen content LNG cargoes to be accessed. However, although the proposed increase is within GS(M)R limits, we are concerned that there has been no analysis undertaken to assess any potential adverse consequences from increasing the permitted limit. There is currently considerable focus on gas quality harmonisation in Europe in the context of the Interoperability Code. Should binding changes to the gas quality standard be proposed, we believe that implementation must be based on a full impact analysis.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

The proposal is consistent with self-governance, although the reduced timescales do not lend themselves to undertaking any meaningful analysis of potential impacts, particularly on end-users.

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

Consistent with self-governance.

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

None identified.

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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.*

None identified.

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

N/A

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