

Representation - Draft Modification Report UNC 0714

Amendment to Network Entry Provision at Perenco Bacton terminal

Responses invited by: 5pm on 12 June 2020

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Pavanjit Dhesi
Organisation:	Interconnector (UK) Limited
Date of Representation:	12 th June
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive

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

Interconnector UK Ltd (IUK) supports the proposal. It enables additional gas to enter the market thereby benefiting both competition and consumers. It is consistent with the UK objective to Maximise the Economic Recovery from the North Sea. Allowing non-GS(M)R gas to enter the National Grid Bacton terminal however must not prevent National Grid from meeting all of its current regulatory and contractual commitments including those set out in the National Grid - IUK Interconnection Agreement.

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

No comment

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

IUK does not envisage any additional on-going costs as a result of this proposal. This is however on the assumption that the additional control measures National Grid are planning to implement for the relevant period will result in no increased risk in off specification gas entering the National Grid pipeline network or being delivered to IUK.

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

IUK understand this is an enabling modification so no legal text has been provided.

Modification Panel Members have requested that the following questions are addressed:

Q1: Considering that National Grid would require HSE approval before the associated Network Entry Agreement could be amended, should the governance of Modification 0714 remain as Authority Direction?

No comment

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 comment

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

IUK agree the modification will further the relevant objectives and welcome National Grid's willingness to facilitate this provided it can be done without increasing the risk of non-specification gas entering the National Grid pipeline network or being delivered to IUK.

IUK believe relevant objective a) is furthered because the proposal facilitates more gas being processed through the existing infrastructure.

IUK believe relevant objective d) is furthered as the proposal facilitates more sources of gas thereby promoting competition in the supply of gas.