

Representation - Draft Modification Report UNC 0737 - Transfer of NTS Entry Capacity from a Capacity Abandoned ASEP

Responses invited by: 5pm on 12 January 2021

To: enquiries@gasgovernance.co.uk

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

Representative:	Terry Burke
Organisation:	Equinor UK Limited
Date of Representation:	12 th January 2021
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive
Relevant Charging Methodology Objective:	a) Positive c) Positive

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

Equinor supports the concept of being able to transfer capacity away from an abandoned ASEP as this leads to a freeze on the holder's ability to utilise their booked NTS capacity. In an unconstrained network it would seem prudent to enable shippers to transfer capacity away from a point that has never been used. Enabling more capacity to come to UK market will help to optimise the NTS and provide shippers with a wider range of options to bring gas to market.

Equinor agrees with the proposer's analysis of compliance against the NC TAR in relation to article 35 and believes any transfer of capacity away from an abandoned ASEP should be carried out free of any restrictions.

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

Implementation to be in line with Authority direction.

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

None

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

We are satisfied the legal text delivers the intent of the solution.

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.*

N/A

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

N/A