

Representation - Draft Modification Report UNC 0826S

Amendment to Network Entry Provision at Shell St Fergus Terminal

Responses invited by: **5pm on 08 December 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Martin Cahill
Organisation:	National Grid
Date of Representation:	02/12/2022
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

National Grid strongly support the proposed modification, on the basis that it provides equitability with other suppliers, it is unlikely to have any material impact on downstream parties, and there are robust and established safety measures to manage the Gas Quality parameters at entry points.

The current GS(M)R specification states that gas conveyed within the system are within an upper Wobbe limit of 51.41 MJ/m³ and a lower limit of 47.20 MJ/m³. Shell are proposing an increase to their contractual limit of 51.4 MJ/m³, which is therefore within the accepted GS(M)R range.

For reference, although it will not need to be used when operations are within the proposed limits, National Grid use the TFA (Terminal Flow Advice) process at every entry point on the NTS to manage the risk of any non-compliant gas being transported.

The key safety measures used in the TFA process are as follows (please also refer to figure 1 for a visual representation and reference points):

1. Gas from all 3 sub-terminals is commingled at the National Grid owned St Fergus asset* before it reaches the NTS. This reduces the risk of any non-compliant gas on the network if a supplier is close to or above the specified Wobbe limit

2. A high value (before reaching a breach) on any Wobbe reading at Q_a , Q_b , or Q_c will initiate a warning call from GNCC to the supplier, and a discussion as to the cause of the issue and expected resolution
3. A 15 minute warning is applied if there is a breach at Q_a , Q_b or Q_c , provided that Q_{abc} is within specification (Q_{abc} is the commingled point which is representative of the gas which will be supplied to the NTS)
4. If a supplier is not back within specification within 15 minutes, curtailment action will be taken by GNCC to reduce flow
5. More immediate action will be taken by GNCC if there is a risk of a breach at Q_{abc}
6. Monitoring of individual supply meters and commingled gas provides additional contingency for any monitoring error. National Grid also regularly calibrates equipment and investigates any discrepancies against supplier readings

* It should be noted that the Distribution Network Offtake at St Fergus also receives gas which has been commingled

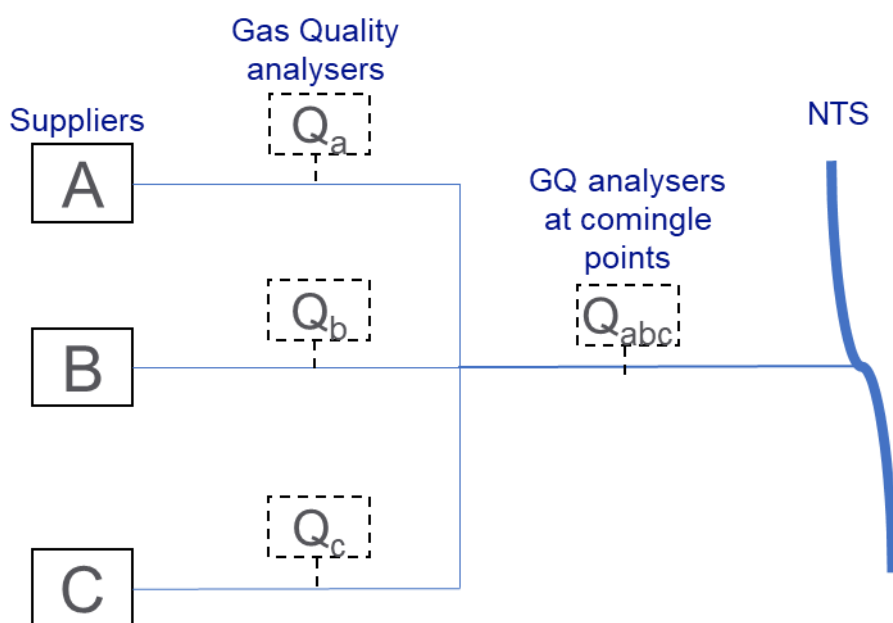


Figure 1 Flow Diagram

Relevant Objectives

National Grid agrees with Shell's statement that the proposed modification meets the relevant objective a) Efficient and economic operation of the pipe-line system. Whilst we cannot comment on the specifics of Shell's operations, it is well established that wider Wobbe range can, in certain circumstances, increase available supply. This is a concept used as part of the Network Gas Supply Emergency, whereby in stage 1 a wider Wobbe range can be used to maximise flows onto the NTS. It has also been explored as part of the GS(M)R review, which proposes to permanently decrease the lower limit.

National Grid also agree that the proposed modification meets relevant objective d) securing of effective competition. The proposed limit is in line with other network entry agreements, and is compliant with GS(M)R.

As this modification is designed to increase available supply, it also demonstrates a benefit for the consumer by increasing security of supply.

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

This change would be compliant with GS(M)R and we believe will not have any material impact on downstream parties. It is in line with other Network Entry Agreements and as such is suitable for self-governance.

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

This is an 'enabling Modification'; it will enable a change to the Network Entry Provisions that apply between National Grid NTS and Shell at St Fergus, and could be implemented once the appeal window that applies to self-governance modifications has passed.

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

There will be some minor resource impacts and costs incurred to carry out administrative arrangements for this change to be made, for example SCADA alarm limits and contractual agreement.

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

This is an enabling Modification, therefore legal text is not required.

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