

Representation - Draft Modification Report UNC 0607

Amendment to Gas Quality NTS Entry Specification at the St Fergus NSMP System Entry Point

Responses invited by: **5pm on 09 November 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Charles Ruffell
Organisation:	RWE Supply & Trading GmbH
Date of Representation:	8 th November 2017
Support or oppose implementation?	Support/
Relevant Objective:	<p>a) Positive</p> <p>d) Positive</p> <p>(i) <i>between relevant shippers;</i></p> <p>(ii) <i>between relevant suppliers; and/or</i></p> <p>(iii) <i>between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.</i></p>

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

We believe that amending the Network Entry Agreement as set out in the proposal will facilitate the continued delivery of this gas into the GB market and represents the least cost option for achieving this. This furthers Relevant Objective (a) *Economic and efficient operation of the NTS*. The furthering of Relevant Objective (d) *Securing effective competition between shippers and suppliers* is also positive as maintaining diverse UKCS gas supplies enhances competition, liquidity and security of supply. From the analysis presented in the DMR, it appears highly unlikely that gas of 5.5mol% CO₂ could flow onto the NTS which in our view limits the potential adverse downstream impacts.

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

N/A as Authority decision.

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

As soon as practical following an Authority decision and the necessary changes being made to the NEA .

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?*

N/A

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.

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

We do not think that the inclusion of a clause to time limit or amend the change in gas quality specification is a good outcome and could set an unwelcome precedent where changes introduced by a UNC modification are contingent upon future events that may or may not materialise.

Although we recognise NGG's concerns, we believe that the current approach of considering each request for a change to gas quality limits on a case by case basis should address their concerns about discrimination. NGG is running a separate industry consultation about the change process for gas quality limits in NEAs that may inform a future approach. However, we do not think that outcome of this separate consultation should impact the decision on 0607.