

Representation - Draft Modification Report UNC 0627S

Removal of the absolute requirement to include a Remotely Operable Valve (ROV) Installation for all new NTS Exit connections

Responses invited by: **5pm on 07 December 2017**

To: enquiries@gasgovernance.co.uk

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| Representative: | Nick King |
| Organisation: | CNG Services Ltd |
| Date of Representation: | 20/11/17 |
| Support or oppose implementation? | Support |
| Relevant Objective: | Relevant Objective d) Positive Section Y (Charging Methodology) Modifications b) Positive c) Positive |

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

We support this change. The NTS connection policy that required an ROV at every connection dates back to the early 1990s; a time when the 'dash for gas' was at its peak and the connections that were built were large scale CCGTs with the potential to affect flows in the wider network. The concern at the time was related to the power station taking more gas than allowed in the NExA; the ROV was a last resort in case this caused problems for the NTS. This change takes into account experience since the first gas fired CCGTs in the early 1990's and is welcome; it will simplify smaller projects. The change is welcome.

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

No comment.

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

We would like to see this change implemented ASAP please.

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

This proposal will result in reduced capital costs for connecting parties and reduced operating costs for National Grid compared to the 'compulsory ROV' alternative.

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

Yes

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

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

N/A