

Representation - Draft Modification Report UNC 0675

Enabling changes to the BBL Interconnection Agreement to facilitate physical reverse flow

Responses invited by: **5pm on 14 May 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Sinead Obeng
Organisation:	Gazprom Marketing and Trading
Date of Representation:	13/05/2019
Support or oppose implementation?	Comments
Relevant Objective:	<p>d) Positive</p> <p>g) Positive</p>

The consultation is aimed at establishing if the content/effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0xxx will be carried forward should parties not wish to change their original representation.

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

We would like to provide comments on the level of transparency provided by National Grid in the UNC Mod 0675 process. The Bacton IP exit will undergo significant operational change to provide further optionality and flexibility to shippers once BBL reverse flow becomes live, however we believe more transparency is required to ensure that the full benefits of this project are realised with minimal disruption. We would welcome further information and analysis from National Grid to confirm that there is no discrimination between shippers at Bacton, i.e. ensuring other Bacton shippers will not face additional costs or operational issues as a result of the newly proposed provisions within the BBL-NTS interconnection agreement.

Without information on the above, it is difficult to assess whether there is a potential impact on other users for this reason.

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

No comments.

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

As soon as reasonably practicable.

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

None currently anticipated although we seek assurances that Bacton maintenance will continued to be arranged in coordination with all Bacton operators once BBL reverse flow commences.

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.*

Lack of detail in the Workgroup Report on the specific changes within the Interconnection Agreement

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