

## Representation - Draft Modification Report UNC 0714

### Amendment to Network Entry Provision at Perenco Bacton terminal

**Responses invited by: 5pm on 12 June 2020**

**To:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Riccardo Rossi
<b>Organisation:</b>	Centrica
<b>Date of Representation:</b>	12 June 2020
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<p>a) Positive</p> <p>The implementation of the Modification will enable the pipeline system to process additional natural gas resources through the existing terminal infrastructure with very limited additional resources needed to ensure the level of gas quality specifications for consumers is not impacted.</p> <p>d) Positive</p> <p>This Modification Gas will enable effective competition between different shippers off-taking gas in the North Sea while alternative upstream blending and treatment solutions will not be available. This will also enable to maintain lower cost, lower carbon UKCS natural gas to GB consumers which is the ultimate rationale for competition between shippers.</p>

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

- This Modification Proposal it represents a pragmatic solution to an issue concerning the gas supplies entering the NTS at Bacton terminal and it would enable a more efficient operation of the pipeline system
- Its implementation will facilitate competition between different gas supplies to be made available to the GB market.
- This low-cost, low-carbon UKCS natural gas sources would be otherwise suspended at the expense of entire system.
- No adverse impact is envisaged to other parties flowing gas or connected to the Bacton Terminal or further downstream. The processes and controls that are

recommended to be put in place by National Grid and the HSE to monitor, track and react to potential off-spec gas are sufficient to avoid concrete adverse impacts.

- The lead-time for these to be put in place is considered appropriate to allow proper consideration of implementation challenges.
- This experience can be used as to draw learning points for an extension of this service by National Grid to other entry points to further securing effective competition between shippers and different type of gas sources.

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

No specific lead-time for the implementation is necessary

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

We do not expect to incur any cost as a shipper for the implementation of this Modification

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

No legal text change is required

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: Considering that National Grid would require HSE approval before the associated Network Entry Agreement could be amended, should the governance of Modification 0714 remain as Authority Direction?*

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