

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

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

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| Representative: | India Koller |
| Organisation: | Scotland Gas Networks and Southern Gas Networks |
| Date of Representation: | 09/06/2020 |
| Support or oppose implementation? | Support |
| Relevant Objective: | a) Positive d) Positive |

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

We are in support of this modification as it furthers relevant objectives a. *efficient and economic operation of the pipe-line system*, and d. *Securing of effective competition*, by allowing more sources of eligible gas to enter the NTS. This increase in supply diversity may result in more shippers bringing gas into the UK market, which may benefit UK consumers.

SGN supports this modification provided the gas does not go below 46.5MJ/m³ on the Wobbe index during the agreed period.

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

The implementation has no direct effect on SGNs processes so we believe this should be implemented at the discretion of the proposer.

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

SGN has not identified any impacting costs to its operations.

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

No legal text was required for this modification.

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?

SGN supports the decision to remain as Authority Direction due to the commercial advantages for parties using the facility.

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