

## Representation - Draft Modification Report UNC 0761

### Arrangements for Interconnectors with additional Storage capability

**Responses invited by: 5pm on 21 March 2022**

**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>	Henk Kreuze
<b>Organisation:</b>	Vermilion Energy Ireland Limited (VEIL)
<b>Date of Representation:</b>	18 March 2022
<b>Support or oppose implementation?</b>	Qualified Support
<b>Relevant Objective:</b>	<p>a) Positive</p> <p>b) None</p> <p>d) Positive</p>
<b>Relevant Charging Methodology Objective:</b>	<p>a) None</p> <p>b) None</p> <p>c) Positive</p>

*The consultation is aimed at establishing if the statement provided by BEIS would cause you to change a view that you previously expressed, or to take a view that you had not previously considered.*

*Please note previous representations received will be carried forward should parties not wish to change their original representation.*

**Modification Panel Members have requested that Modification is re-issued to Consultation with the aim of establishing if the statement provided by BEIS would cause you to change a view that you previously expressed, or to take a view that you had not previously considered.**

VEIL has participated in the workgroup meetings, but hadn't provided a written response earlier.

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

Vermilion Energy supports the possibility that interconnectors (like Interconnector and BBL) offer storage products, based on the available linepack in the respective interconnector. We provide "qualified" support, as this Modification only considers the impact/status at the GB Interconnection Point Bacton. To our opinion adequate means

should be available to verify the quantity stored/withdrawn corresponds with pressure changes in the interconnector, i.e. that it can be verified that the storage service is only been provided by the linepack from the interconnector itself. We want to avoid that linepack from the adjacent TSO (National Grid, Fluxys or GTS) is used by the interconnector to enable the service.

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

No comments

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

No comments

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

No comments

**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.*

As mentioned above, as soon as an interconnector offers a storage service, adequate means should be available to verify the quantity stored/withdrawn corresponds with pressure changes in the interconnector, i.e. that it can be verified that the storage service is only been provided by the linepack from the interconnector itself.

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

With respect to a potential storage service offered by Interconnector, relevant information on the current points Bacton and Zeebrugge should be publicly available in a transparent manner to enable shippers and other market parties to do a verification that the storage service is only been provided by the linepack from the interconnector itself.

With respect to a potential storage service offered by BBL, relevant information on the current point Bacton as well as Julianadorp should be publicly available in a transparent manner to enable shippers and other market parties to do a verification that the storage service is only been provided by the linepack from the interconnector itself. It has to be noted that since a couple of years Julianadorp is no longer an Interconnection Point and therefore no information is yet being made public for Julianadorp (BBL and GTS system are merged into one market area). So as soon BBL would initiate to offer a storage service, GTS and BBL should make proper arrangements, to ascertain that no linepack/flexibility from the GTS system can be used by BBL to offer such a service.