

## Representation - Draft Modification Report UNC 0780S

### Amendment to Gas Quality NTS Entry Specification at the St Fergus SAGE System Entry Point

**Responses invited by: 5pm on 11 February 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>	Angela Fletcher
<b>Organisation:</b>	Ancala Midstream Acquisitions Limited ( <b>Ancala Midstream</b> )
<b>Date of Representation:</b>	11 February 2022
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<p><b>a)</b> Positive</p> <p><b>d)</b> Positive (i) between relevant shippers and (ii) between relevant suppliers and (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.</p>
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

The proposed modification will enable efficient and economic operation of the pipeline system (Relevant Objective (a)) by maximising the delivery of gas from the SAGE Terminal into the NTS and supporting reduction in the cost of and scope 1 emissions from oversized and redundant equipment. The modification supports both Central Obligations of the Oil & Gas Authority's Strategy; (i) to secure that the maximum value of economically recoverable petroleum from the United Kingdom continental shelf and reduce emissions from oil and gas assets. Analysis undertaken during the modification process has demonstrated that infrequent CO2 excursions can be accommodated with minimal impact on gas quality. National Grid has confirmed that it has risk assessed the impact of the rate of change of gas quality and found it acceptable even in the most pessimistic scenario provided by SAGE North Sea. SAGE North Sea has identified several options to reduce the rate of change of CO2 concentration and enable real time monitoring and automated response. The risk of disruption is negligible. This modification secures effective competition between suppliers and terminal operators and the reliable delivery of gas to UK consumers. UNC Modification 0607 was granted in relation to the NSMP terminal at St Fergus on a related basis. Granting of this modification ensures that there is no discrimination between terminal operators at St Fergus. Analysis confirms that there will be negligible emissions for domestic or industrial consumers as a result of this Modification. The modification will

support removal of scope one emissions consistent with UK Government objectives in the move to Net Zero.

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

Ancala Midstream agree that this modification should be subject to self-governance.

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

Ancala Midstream believe there is no reason to delay the implementation.

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

None

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

Not applicable in this case.

**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**