

Representation - Draft Modification Report 0561S

Amendment to the oxygen limit within the BBL/NTS Interconnection Agreement

Responses invited by: **05 November 2015**

To: enquiries@gasgovernance.co.uk

Representative:	Mark Lyndon
Organisation:	National Grid NTS
Date of Representation:	04 November 2015
Support or oppose implementation?	Support
Relevant Objective:	g) Positive

Reason for support/opposition: reason(s)

As the proposer of this Modification, National Grid NTS supports implementation.

BBL Company has requested a change to the current Gas Entry Conditions within its Interconnection Agreement, as the instantaneous oxygen limit of 10ppm at the Bacton System Entry Point is not compatible with Dutch law, which requires all Interconnection Points (IP) in Holland to have an Oxygen limit of 10ppm as a 'daily average'. BBL Company believe that there is a potential risk that imported gas flows with a higher Oxygen content than 10ppm permitted to enter the BBL pipeline at Julianadorp may be rejected by National Grid NTS at Bacton.

BBL believes that increasing the current instantaneous limit of 10ppm to 200ppm via an enabling Modification, to facilitate the amendment within the Interconnection Agreement will remove the risk of gas flows exceeding their oxygen limit at Bacton.

National Grid NTS considers this to be a pragmatic solution.

National Grid NTS also believes that this Modification if implemented will better facilitate compliance with the Relevant Objective g) as it helps to demonstrate the general co-operation obligations between TSOs required under EU Regulation 715/2009.

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

We agree with the Panel's decision that 0561S should be a Self-Governance Modification and subject to Self -Governance procedures.

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

This Modification has been proposed as Self Governance and therefore could be implemented with immediate effect 16 Business Days after an approval decision by the UNC Modification Panel.

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

None

Legal Text: *Are you satisfied that the amendments proposed to the Interconnection Agreement will deliver the intent of the Solution?*

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

None