

## Representation - Draft Modification Report 0553

### Removal of National Grid LNG Storage UNC TPD Section Z obligations and associated cross references

Responses invited by: **05 November 2015**

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

<b>Representative:</b>	Maggie Steven
<b>Organisation:</b>	National Grid LNG Storage
<b>Date of Representation:</b>	5 <sup>th</sup> November 2015
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive

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

UNC TPD Section Z specifically relates to National Grid LNG Storage Facilities. As Avonmouth, the last remaining National Grid LNG Storage Facility, will cease operational activity on gas day 30 April 2016 it is sensible to remove existing Section Z obligations on National Grid LNG Storage and make clear in regard to UNC Section Z, Section 3 that no capacity will be available or offered for Storage Year 2016/2017 or for any future years. This proposed Code Modification also takes into consideration the references to National Grid LNG Storage and Section Z throughout UNC TPD.

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

National Grid NTS believe that this modification is primarily housekeeping in nature and should be Self-Governance as it is unlikely to have a material impact on competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

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

As soon as practical but noting National Grid LNG Storage's request the Code Modification is implemented no later than 01 March 2016.

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

No costs have been identified

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

Yes, National Grid LNG Storage agrees that the legal text delivers the intention of the modification.

**Modification Panel Members have requested that the following question be addressed:**

**Q1: Respondents to provide a view as to whether or not this modification should be redesignated as self-governance.**

The Avonmouth facility, irrespective to this Code Modification, will close on 30<sup>th</sup> April 2016. As such this is a housekeeping Code Modification as it aims to remove superfluous references to National Grid LNG Storage and UNC Section Z and thereby remove any uncertainty relating to the existence of National Grid LNG Storage facilities within UNC.

This Code Modification should be Self-Governance as it is unlikely to have a material impact on competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.

**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.*

None identified

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

None