

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

Representative:	Fergus Healy
Organisation:	National Grid NTS
Date of Representation:	5 November 2015
Support or oppose implementation?	Support
Relevant Objective:	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. Avonmouth is the last remaining National Grid LNG Storage facility and (irrespective of this modification) will cease operational activity on gas day 30 April 2016. As such it is sensible to remove existing Section Z obligations on National Grid LNG Storage, references to National Grid LNG Storage and Section Z (throughout the UNC) and make clear that no capacity will be available or offered for Storage Year 2016/2017 or for any future years.

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 is practical however we do note that the Proposer has stated that they wish to see the modification implemented by no later than the 1 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, we agree 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.

National Grid LNG have indicated that the Avonmouth LNG facility will be closing irrespective of this modification proposal, as such this modification is primarily housekeeping in nature removing UNC TPD Section Z and what will be superfluous references to National Grid LNG Storage. Self-Governance is appropriate for this modification 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