

Representation - Draft Modification Report UNC 0675

Enabling changes to the BBL Interconnection Agreement to facilitate physical reverse flow

Responses invited by: **5pm on 14 May 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Rudi Streuper
Organisation:	BBL Company VOF
Date of Representation:	14 th May 2019
Support or oppose implementation?	Support
Relevant Objective:	<p>d) Positive</p> <p>g) Positive</p>

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

This modification enables amendments to be made to the Interconnection Agreement (mainly the Network Exit Provisions) between National Grid Gas Plc and BBL Company VOF, to provide for gas to be physically offtaken from the NTS at the BBL Interconnection Point at Bacton as requested by BBL Company VOF. The physical reverse flow of the BBL Interconnector will enhance the level of interconnection between Europe's largest trading hubs: TTF and the NBP. This will facilitate the creation of more liquidity in the GB and Dutch gas market, thereby securing more effective competition. It will also further compliance with the revised Security of Supply Regulation¹ in that it enables physical reverse flow as required by that Regulation.

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

BBL Company has been advised that this modification continues to meet the self-governance criteria.

¹https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2017.280.01.0001.01.ENG&toc=OJ:L:2017:280:TOC

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

Preferably the UNC Modification Panel will consider this modification and its consultation responses at the May meeting which, if approved, would enable its implementation on 11th June 2019. Following which, the TSO's would have to ability to act in accordance with the amended terms of the Interconnection Agreement. This would facilitate BBL Company VOF's ambition of having the capacity product available from Summer 2019.

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

No ongoing costs identified.

Legal Text: *Are you satisfied that the legal text 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.