

Representation - Draft Modification Report 0581S

Amending the Oxygen content limit specified in the Network Entry Agreements at Grain LNG

Responses invited by: **5pm 13 May 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Gerry Hoggan
Organisation:	Scottish Power
Date of Representation:	13 May 2016
Support or oppose implementation?	Oppose
Relevant Objective:	d) Negative

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

Whilst we may understand and appreciate the underlying rationale behind the proposal, Scottish Power is of the view that there has been inadequate assessment of the wider potential impacts of implementation and furthermore we have had insufficient opportunity to evaluate such impacts on our own facilities. As a consequence we cannot support the proposal at this time.

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

Scottish Power do not agree with the Self Governance Statement within the Modification Proposal on the basis that no assessment has been made of potential impacts, or their materiality, for such as CCGT and Gas Storage Operators. These potential impacts only came to light as part of our internal review processes following publication of the consultation.

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

A view on implementation lead time could only be taken once a fuller understanding of potential impacts had been gained.

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

Any quantification of costs would be entirely dependent on an assessment of the impacts identified and to this point Scottish Power, and most likely other potentially impacted

users, have had inadequate time to conduct any such assessment allowing for the limited development and consultation periods.

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.*

The Report contains no assessment of potential impacts.

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

None