

## 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](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Andrew Blair
<b>Organisation:</b>	Interconnector (UK) Limited
<b>Date of Representation:</b>	16 May 2016
<b>Support or oppose implementation?</b>	Comments
<b>Relevant Objective:</b>	<b>d) (i)</b> None <b>d) (ii)</b> None <b>d) (iii)</b> None

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

IUK is neutral on whether the revised limit is allowed at Grain LNG but would like to highlight the ongoing work on gas quality harmonisation going on within the EU and specifically the open ENTSOG consultation on the CEN 16726 gas quality standard. Our concern is that the introduction of gas with higher levels of oxygen should not inhibit National Grid Gas's ability to comply with the CEN standard if its application becomes mandatory.

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

No comment

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

We would suggest that prior to implementation, National Grid Gas should analyse the effect of introducing gas with higher levels of oxygen on the network to ensure all offtake points are not adversely affected.

We note the difficulty in gathering the oxygen data at entry points reported by National Grid Gas at the Transmission Workgroup, and suggest that the data gathering and analysis is completed, as far as possible, to allow a more complete picture in respect of maximum oxygen limits to be developed across the whole network.

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

Potential conflict with differing gas quality specifications being applied by TSOs in GB and Belgium.

**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 comment.

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

Many EU TSOs already operate with an oxygen limit of 10 ppm (0.001%) expressed as a moving 24 hour average, the specification set out in the CEN gas quality standard.

It should be noted that in UNC Mod 561S, BBL were looking for this daily average to be adopted rather than an instantaneous value, to allow them to match their entry specification. As National Grid Gas's operating procedures did not allow such an approach to be adopted, it was opted to set a higher instantaneous limit of 200 ppm to provide some tolerance, as the 24 hour average approach is designed to do. The risk to supplies entering the NTS from BBL with significantly higher levels of oxygen is non-existent due to the specification that applies in Holland, so it is not directly comparable with Grain LNG.