

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:	Sinead Obeng
Organisation:	South Hook Gas Ltd
Date of Representation:	13 May 2016
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) (i) Positive d) (ii) Positive d) (iii) Positive

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

We identify that there is a benefit to the UK gas market in increasing the oxygen content limit at Grain. Increasing the limit to 0.02 mol % does not compromise operational risks as this is still within the GSMR. It also allows potential for wider specifications of LNG to be delivered into the UK from the global market, helping to maintain the crucial role gas plays in the future of the UK's energy security. In order for the UK gas market to reap the full benefits of this, in particular Relevant Object d) i) and with the objective of free and fair competition taken into account, all LNG entry points in principle should have the ability to amend their oxygen content limits.

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

We agree that the modification is suitable for Self-Governance.

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

As soon as reasonably practicable.

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

If implemented, the proposal should not have any negative impact on SHG's business assuming all other LNG entry points are not excluded from amending their oxygen content limits in principle.

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.