

## 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>	Colette Baldwin
<b>Organisation:</b>	E.ON UK
<b>Date of Representation:</b>	13 <sup>th</sup> May 2016
<b>Support or oppose implementation?</b>	Qualified Support
<b>Relevant Objective:</b>	d) (i) Positive d) (ii) Positive

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

The increase in the permitted level of Oxygen in the gas that enters the gas network at Grain LNG will allow greater flexibility in accepting LNG onto the network, which will improve competition in shipping and supply.

The increase is modest and is consistent with changes already implemented elsewhere, however, due to the compressed modification assessment and consultation timelines the issues being identified in respect of impacts on storage arrangements and equipment and the consequential costs have not been considered by a workgroup.

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

We support the self-governance statement as this is doesn't have a material impact on competition.

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

As quickly as possible after a Self-Governance Panel decision.

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

None

**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.*

Yes. The costs and benefits of introducing LNG with higher oxygen content at Grain, and the longer term financial impacts on storage & related costs.

Equally, we are unsure whether there will be any other wider consequences from the changed nature of the gas, such as increased burning times resulting in increased emissions.

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

N/A