

## **Modification 0645 – Amending the Oxygen Content Limit in the South Hook NEA**

### **Workgroup Report - National Grid Comments**

#### **1. Section 3 - Governance**

Delete “There is no discrimination between any of these parties”.

#### **2. Section 4 – What the effects are should the change not be made**

Should the reference to South Hook LNG be to South Hook Gas (i.e the shipper rather than the DFO)

#### **3. Section 5 – Code Specific Matters**

Should we quote the FMRs for the Grain and BBL mods as reference documents?

#### **4. Section 7 – Impacts and other considerations**

There’s a “not” missing from the red text.

#### **5. Heat map analysis results**

Where we say that all other terminals are assumed to flow at their contractual specification we should recognise that the analysis therefore represents a ‘worst case’ in terms of oxygen content.

Where we say that storage sites are generally assumed to be withdrawing in the winter analysis we could add that provided this is the case, those in the NW would not be adversely affected even if South Hook gas penetrated that far into the network. To be consistent, the summer commentary ought to say that storage sites would face a risk as they are assumed to be injecting.

On page 7, I don’t agree with the statement “of the 4 heat maps provided, this is effectively a worst case scenario” – suggest delete.

On page 8 where we reference the historic flows, it would be worth qualifying that for the last 2 years, Milford flows have been a fraction of those assumed in the modelling.

#### **6. Page 15 – Relevant Objectives - Positive Impact of Increasing Oxygen Limit**

The current text majors on facilitating more gas to be delivered at South Hook. My understanding of the mod is that this might be a side-benefit; the main driver being to mitigate a processing issue associated with ICF breach? So I wonder if it’s more about protecting existing deliveries and not having them curtailed because South Hook have gone out of spec on ICF. So maybe some clarification here but either way I’m OK with the argument that this proposal enables SH deliveries which will have a positive effect on competition between shippers.

We could also add that it would deliver equivalence in O2 spec with Grain which will help facilitate a level playing field among shippers delivering LNG regas to the NTS.

Can we also be more accurate with the relevant objective quotation, which is specifically in relation to competition among shippers, suppliers and DNs, rather than “various parties”.