

## Representation - Draft Modification Report UNC 0712S

### Amending the oxygen content limit in the Network Entry Agreement (NEA) at the St Fergus SAGE plant

Responses invited by: **5pm on 12 March 2020**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

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|--|---|
| <b>Representative:</b>                   | Halvard Engeseth  |
| <b>Organisation:</b>                     | WintershallDea Norge AS (org no. 985 224 323)<br>("WintershallDea") |
| <b>Date of Representation:</b>           | 12 March 2020   |
| <b>Support or oppose implementation?</b> | Support   |
| <b>Relevant Objective:</b>               | d) Positive   |

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

WintershallDea supports the proposed UNC Modification as it will enable increased import of Norwegian gas from the Utsira High area to the SAGE Gas Terminal and the National Transmission System (NTS). Increasing gas deliveries to the NTS promotes competition in the gas market and enhances security of long term gas supply to the UK.

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

Other UNC modifications relating to oxygen dispensation are self-governing and the proposed modification should be dealt with consistently.

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

Timely implementation following approval of the UNC Modification is appreciated.

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

Implementation of requested modification will not involve additional cost on the shippers.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: Please provide clear views and supporting evidence on the self-governance status of this modification focusing, in particular, on whether this proposal is likely to have a material impact upon competition in the shipping, transportation or supply of gas.*

Proposal will enable supply of gas from new sources to the UK market and increase the competition. The proposal will also enhance security of supply for the UK.

*Q2: Respondents to provide a view as to whether or not this modification should be [re]designated as self-governance.*

Other UNC modifications relating to oxygen dispensation are self-governing and the proposed modification should be dealt with consistently.

*Q3: Please provide your views on the self-governance status.*

No objections

**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 error/omissions identified

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

Nothing to add