

Representation - Draft Modification Report UNC 0787S

Introducing amendments to the interconnection agreement with Interconnector Limited to reflect latest operational standards and practices

Responses invited by: **5pm on 18 January 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Malcolm Montgomery
Organisation:	National Grid NTS
Date of Representation:	18/01/2022
Support or oppose implementation?	Support
Relevant Objective:	b) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

As proposer of this modification National Grid NTS (NG) supports its implementation. This is an enabling modification that provides the governance for making changes to relevant provisions with the interconnection agreements between NG and Interconnector Ltd (INT). The changes relate to gas quality, flow rates, PRISMA and general communications between operators and can be characterised as bringing the agreement in line with the latest operational standards and practices. This ensures NG is operating the NTS in a coordinated and efficient manner and so furthers relevant objective b) coordinated, efficient and economic operation of (i) the combined pipeline system.

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

As proposed within the modification then self-governance is appropriate because we believe no material changes are being proposed that would warrant Authority consideration.

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

Implementation could take place as soon as both parties have completed their necessary governance processes. However, we also see merit in aligning the implementation date with the changes proposed under modification 0786S, as both modifications propose changes to the same agreement.

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

No costs identified. Efficient coordination between operators should see ongoing costs reduce in the long run.

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

As an enabling modification then no changes are proposed to the UNC itself. Change marked copies of the revised interconnector agreements have been provided, and we are satisfied they deliver the intent of the Solution.

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.*

n/a

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

n/a