

## Representation

### Draft Modification Report

#### 0478 - Filling the gap for SOQ reductions below BSSOQ until Project Nexus

**Consultation close out date:** 21 March 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Eni Trading & Shipping (UK branch)  
**Representative:** Steve Williams (Marketing & Sales Manager)  
**Date of Representation:** 20 March 2014

#### Do you support or oppose implementation?

Eni support implementation.

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

Eni supports proposal to permit users to reduce their SOQ below that of the Bottom Stop SOQ. Previously MOD 275 and 405 both introduced this function on a temporary basis.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

There are no new issues we wish to add.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

As stated in the modification proposal, we agree with proposer's objective of achieving "efficient and economic" operations of the pipe-line system.

#### Impacts and Costs:

*What analysis, development and ongoing costs would you face if this modification were implemented?*

None.

#### Implementation:

*What lead-time would you wish to see prior to this modification being implemented, and why?*

We believe the modification should be implemented as soon as reasonably practical to allow appeal in the next capacity reduction window opening on the 1<sup>st</sup> October 2014.

#### Legal Text:

*Are you satisfied that the legal text will deliver the intent of the modification?*

Yes.

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21 February 2014

Version 1.0

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**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No.