

## Representation - Draft Modification Report 0595S

### Amendment to the Arrangements between National Grid NTS and GNI at the Moffat IP to provide for Interruption of Virtual Reverse Flow

Responses invited by: **5pm on 10 November 2016**

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

<b>Representative:</b>	Phil Lucas
<b>Organisation:</b>	National Grid NTS
<b>Date of Representation:</b>	3 <sup>rd</sup> November 2016
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>g)</b> Positive

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

As proposer, National Grid NTS fully supports implementation of this Modification Proposal and agrees with the conclusion of the Workgroup that implementation would better facilitate Relevant Objective g) on the basis that implementation would demonstrate co-operation between Transmission System Operators (in this case between National Grid and Gas Networks Ireland ('GNI') in the Republic of Ireland) as required under EU Regulations.

#### Self-Governance Statement:

We agree with the conclusion of the Workgroup that this Proposal is suitable for Self Governance procedures for the reasons stated in the Draft Modification Report.

#### Implementation:

As noted in the Draft Modification Report, the consequential changes that would be made to the Tri-Partite Agreement would not necessitate any change to the GB central systems. Further, both GNI (in respect of 'exit' provisions) and National Grid (in terms of 'entry' provisions) have existing Transportation Arrangements in place at Moffat. On this basis there is no lead time required for implementation.

#### Impacts and Costs:

National Grid NTS would not be exposed to any analysis, development or additional ongoing costs in the event of implementation.

### **Legal Text:**

We note that as an 'enabling' Modification (effectively seeking GB Users' approval of a change to the inter-TSO arrangements between National Grid NTS and GNI) there is no UNC legal text associated with this Proposal.

National Grid NTS and GNI have agreed the changes to the Tri-Partite Agreement as detailed in the Appendix of the Draft Modification Report.

### **Are there any errors or omissions in this Modification Report that you think should be taken into account?**

National Grid NTS has not identified any such errors or omissions.

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

Not applicable.