

Representation - Draft Modification Report UNC 0607
Amendment to Gas Quality NTS Entry Specification at the St Fergus NSMP System Entry Point

Responses invited by: 5pm on 09 November 2017

To: enquiries@gasgovernance.co.uk

Representative:	Terry Burke
Organisation:	Statoil UK Ltd
Date of Representation:	9 th November 2017
Support or oppose implementation?	Oppose
Relevant Objective:	<p>a) Negative d) Negative</p> <p><i>(i) between relevant shippers;</i></p> <p><i>(ii) between relevant suppliers; and/or</i></p> <p><i>(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.</i></p>

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

The proposal allows for an increase in CO₂ limit of the NEA. In view of the remote possibility of gas above 5.5mol% CO₂ Statoil does not support this modification.

Statoil opposes the modification because the proposal will effectively result in the termination of existing commercial arrangements by allowing an increase of CO₂ parameters. Statoil feels the proposal will have an impact on reducing competition or choice in the provision of commercial gas blending services.

National Grid has also expressed concern about the potential for an anti-competitive effect if they are unable to grant such requests in the future.

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

Statoil welcomes authority decision for this modification.

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

Statoil does not support implementation.

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

The impact as outlined in the 1st paragraph would be to terminate existing commercial arrangements.

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

N/A, no legal text required as this is an enabling modification.

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.*

. None

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

Statoil wishes to point out that National Grid have launched a Gas Quality Consultation which closes on 17th November. We feel their consultation is important to the whole issue around gas quality therefore this modification should be considered after the conclusion of National Grid consultation.