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Dear Julian

RE UNC Modification Proposal 0049 – Optional Limits for Inert Gases at System Entry Points

Thank you for the opportunity to comment on this Modification Proposal.

We are supportive of the implementation of this Modification Proposal as we believe that it furthers the relevant objectives of the Transporter in the efficient and economic operation of the pipeline system, promotes effective competition between Users and supports the supply security standards.

By removing the direct limitation of the proportion of gas accounted for by inerts and Nitrogen and raising the limit for Carbon Dioxide to 2.50% mol, this will allow quantities of gas to enter the Transmission system that would otherwise be prohibited. The proportion of these elements for gas entering the system would then be governed by adherence to the Wobbe index factor, which is set within Gas Safety (Management) Regulations 1996.

Our understanding is that the quantities of gas that would be permitted following this change may be fairly modest but it is not appropriate to exclude such quantities unnecessarily. As long as the gas complies with the Wobbe index standard it would not be to the detriment of any gas consumers to accept it on to the system.

We would also make the observation that the implementation of this Modification Proposal would not have any effect upon specific standards for gas quality contained within Network Entry Agreements, where these have been set at different levels reflecting local conditions.

Please contact me if you require any further information.

Yours sincerely,

Mike Young
Commercial Manager

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