

TRANSCO NETWORK CODE MODIFICATION PROPOSAL No. 0720
"Amendment of Network Entry Provisions at Rough entry point"
Version 2.0

Date: 23/09/2004

Proposed Implementation Date:

Urgency: Non-Urgent

Justification

Centrica Storage Ltd ("CSL") requires a change to its Network Entry provisions to align any changes in entry conditions at other Network Entry points with those in operation at the Rough entry point.

- The Rough exit point (injections) takes gas from the NTS. CSL needs to ensure that the Rough entry conditions (withdrawal) are aligned with any changes to Network entry provisions on the NTS. Otherwise, it is possible that gas injected into Rough from Winter 04/05 could be of a specification the current Rough entry point would not allow for re-delivery into the NTS.
- This could cause Transco to prevent gas entering the NTS from Rough, leading to discrimination against Rough Users and removal of potential benefits from the additional winter supplies made possible by modifications to Network Entry provisions.

Recent changes to Network Entry Provisions will enable lower Wobbe gas supplies to be delivered to the NTS. The Rough exit point (i.e. injections) takes gas from the NTS and therefore it is possible that, at some time during injection operations, gas of a lower Wobbe limit will enter the Rough reservoir. CSL has a lower Wobbe limit higher than some Network Entry points. CSL must ensure that gas re-delivered from Rough to the NTS is compliant with Rough's current entry provisions, contained within the Storage Connection Agreement ("SCA"). This modification seeks to further the relevant objectives by securing effective competition between relevant shippers by removing any undue discrimination between Rough and other Network Entry points.

This Proposal is raised in accordance with the provisions of Section I2.2.3 that require amendment of Network Entry Provisions by way of a Network Code Modification, once Transco and the Delivery Facility Operator have agreed to change the Network Entry Provisions and to incorporate these in a Network Entry Agreement (contained in this instance within the current SCA).

Nature of Proposal

It is proposed that the gas entry provisions, which form part of the Network Entry Provisions for the Rough System Entry Point, would be amended as follows:-

Proposed Specification

Gas Quality Characteristic	Current Specification	Proposed Specification
Rough Wobbe Lower Limit	48.14 MJ/m ³	47.20 MJ/m ³
For Reference		GS(M)R Specification 47.20 MJ/m ³

Purpose of Proposal

Implementation of this modification would secure effective competition between relevant shippers by not giving rise to undue discrimination. This is achieved by ensuring Users at Rough are not discriminated against, through ensuring consistent gas entry conditions. CSL considers the efficient and economic operation of the pipeline system is furthered by removing the possibility of out of specification gas being re-delivered at the Rough entry point, where at another entry point, that gas would be deemed to be within specification. This purpose of the proposal is also important in respect of security of supply and maximising gas availability.

Consequence of not making this change

Should this modification not be made, it is possible that gas injected into Rough storage could be of a specification that could not then be re-delivered to the NTS. This reduced supply of gas will distort competition in the provision of gas balancing and other system services that Transco must procure to operate the system.

Area of Network Code Concerned

Section I - Entry Conditions

Proposer's Representative

Tom Welch (Centrica Storage Ltd (CSL))

Proposer

James Lawson (Centrica Storage Ltd (CSL))

Signature

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