

## Representation

### Draft Modification Report

#### 0352 – The Introduction of an Interruptible Reverse Flow service at Moffat Interconnector

**Consultation close out date:** 12 August 2011

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Scotia Gas Networks

**Representative:** Colin Thomson

**Date of Representation:** 10 August 2011

#### Do you support or oppose implementation?

Support

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

The implementation of this modification would lead to a greater integration of the markets within the UK and Ireland, providing increased competition.

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

As the downstream Transporter to Stranraer the implementation of this modification cannot lead to any detrimental effect on SGN's ability to meet its Licence obligations or physical effect on the capacity of the downstream network in order to satisfy the planning standard.

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

We are in agreement with the proposer that this modification is not self-governance.

#### Relevant Objectives:

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

We agree with the proposer that the implementation of this modification will better facilitate the achievement of Relevant Objectives b and d:

b) Coordinated, efficient and economic operation of  
(i) the combined pipe-line system, and/ or  
(ii) the pipe-line system of one or more other relevant gas transporters.  
Efficient and economic operation of the pipe-line system.

d) Securing of effective competition:  
(i) between relevant shippers;  
(ii) between relevant suppliers; and/or  
(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

**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?*

Subject to the Irish regulators approval of the CSA this modification could be implemented quickly, opening up the market to competition.

**Legal Text:**

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

Yes.

**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.*

None.