Representation - Draft Modification Report 0498 and 0502

0498 - Amendment to Gas Quality NTS Entry Specification at BP Teesside System Entry Point

0502 - Amendment to Gas Quality NTS Entry Specification at the px Teesside System Entry Point

Responses invited by: 24 July 2015	
Representative:	Erika Melén
Organisation:	Scotland & Southern Gas Networks
Date of Representation:	24th July 2015
Support or oppose implementation?	0498 - Comments 0502 - Comments
Relevant Objective:	**a)** Unclear **d)** Unclear

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

We'd like to re-state our initial response – "Our primary concern regarding the possible increase in Carbon Dioxide levels from the NTS relates to the potential increase in corrosion in metallic mains within our lower pressure tiered systems. An increased level of carbon Dioxide would have the effect of reducing the pH of any water that may have inadvertently entered the system thereby increasing corrosion."

As there is currently no guarantee or knowledge of potential volumes of gas which may enter the system at the suggested values, if any, it is very difficult to assess the true impacts, costs and potentially benefits of this change. This modification has been developed with a certain customer in mind and industry needs to ensure that any arrangements implemented, should this modification be accepted, must not amend overall arrangements thereby potentially reducing the quality of gas currently flowing into the system.

In regards to the relevant objectives we have stated that we are unsure of the whether this modification furthers either a) or d) as there is not sufficient analysis or evidence in place to make this determination. Although additional gas supplies could support security of supply, at this time the relevant projects are not guaranteed to go ahead.

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

We agree that the implementation date within the relevant NEA should be 2020 or later

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

As stated above SGN could face additional costs should these arrangements lead to a significant volume of gas entered leading to higher corrosion levels in our network. Not knowing volumes or timescales we are unable to determine impacts in any further detail at this time

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

Yes

Modification Panel Members have requested that the following questions are addressed:

Q1: Respondents are requested to quantify any additional costs they would incur as a result of a CO_2 excursion to 4.0 mol% at the Teesside terminal (flow maps are included to help respondents; see figures A2.1 to A2.4 in Appendix 2).

As above we do not feel that sufficient information has been made available to enable us to quantify costs at this time

Q2: Respondents are requested to quantify any wider benefits/dis-benefits for the UK economy that might be derived from these proposals.

We are not able to answer this question without further industry analysis

Q3: Respondents are requested to quantify the security of electricity supply risk to CCGTs. It would be useful to know how many CCGTs could be affected, when they might be impacted and what flexibility there is elsewhere in the system to accommodate.

This is not a question relevant to SGN

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.*

No

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

N/A