

## Representation

### Draft Modification Report

#### 0355 - Alignment of CV and Wobbe Limits at NTS System Entry Points

**Consultation close out date:** 08 April 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** TOTAL E&P UK Ltd  
**Representative:** Iain McCombie  
**Date of Representation:** 21 March 2011

#### Do you support or oppose implementation?

Support

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

We agree with the Proposer's aim to improve alignment of gas quality parameters by extending the wobbe and CV limits at NTS System Entry Points where contractual limits currently lie inside the allowable ranges and such changes are consistent with the Gas Safety (Management) Regulations 1996.

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

No.

#### Self Governance Statement:

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

Yes.

#### Relevant Objectives:

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

We agree that implementation of revised gas quality limits could enhance effective competition between relevant shippers by allowing shippers that deliver gas into the NTS at the specified System Entry Points the potential to deliver gas of an equivalent CV and wobbe range that would currently be permitted at any new NTS System Entry Point. This would potentially increase the amount of gas made available to the GB market, thus promoting competition.

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Version 1.0

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**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?*

We agree with the suggestion to implement this modification 15 business days after a positive Panel decision.

**Legal Text:**

Please note that legal text is not required in support of this modification as no changes to the Uniform Network Code are required should the modification be implemented.

**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.*

No.