

## Issue received by Email

### 0780S - Amendment to Gas Quality NTS Entry Specification at the St Fergus SAGE System Entry Point

**Date:** 09 December 2021

**Organisation:** National Grid NTS

**Abstract:**

National Grid NTS has identified an additional issue in relation to Modification 0780S following the conclusion of the Workgroup phase, namely that if gas flows from the SAGE terminal only at St Fergus (or if that were to be the dominant source of supply) co-incident with a 'slug' of high CO<sub>2</sub> gas coming through that terminal, then the associated drop in the calorific value of the gas exiting National Grid's St Fergus terminal could be sufficiently material to cause operational problems with NTS compressors further downstream. National Grid NTS would therefore wish to see the Solution amended such that National Grid NTS would be permitted to reduce the CO<sub>2</sub> limit from 6% if this scenario were to materialise, subject to the 2 year lead-time for which the case has been made during the Workgroup discussions.

National Grid NTS believes it to be unlikely that events would conspire in this way based on the expected frequency of high CO<sub>2</sub> events and the flows normally seen from the Shell and NSMP terminals, however it remains a possibility and therefore having a reference to it in the modification and subsequently in the NEA is preferred.

Having discussed the issue with the Proposer, a potential change to the solution could be:

*"It is proposed that National Grid NTS shall be permitted to reduce the CO<sub>2</sub> limit at the St Fergus SAGE System Entry Point to a level between 4.0 mol% and 6.0 mol% with a 2 year notice period if:*

- (a) another UNC Modification(s) is raised that seeks to increase the CO<sub>2</sub> limit at another NTS System Entry Point that National Grid NTS would be unable to accommodate without incurring material cost; and/or*
- (b) if in the reasonable opinion of National Grid NTS, the 6.0mol% CO<sub>2</sub> limit has had a material adverse impact on the operation of any NTS compressor and/or the determination of emissions from an NTS compressor"*

National Grid would like to suggest that a preferred way forward would be to seek a 1 month extension to the 0780S Workgroup from December Panel to allow the issue to be raised with the Workgroup in early January 2022 ensuring full transparency of it and for a revised Workgroup report to come back to panel in January with a request to go out to consultation at that stage. National Grid expects that the alternative of issuing to consultation in December is likely to result in a longer timeframe before a decision on the Modification, if this were to be raised as a 'new issue' in the consultation representations.

**Phil Hobbins**

National Grid NTS