

Representation - Draft Modification Report UNC 0786S

Amendment of the framework for the Bacton exit pressure service to interconnectors

Responses invited by: **5pm on 18 January 2022**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Malcolm Montgomery
Organisation:	National Grid NTS
Date of Representation:	18/01/2022
Support or oppose implementation?	Support
Relevant Objective:	d) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

As proposer of this modification National Grid NTS (NG) supports its implementation. This is an enabling modification that provides the governance for making changes to relevant provisions with the interconnection agreements between NG and Interconnector Ltd (INT), and NG and BBL company. The changes will allow for a consistent pressure service to be provided to both BBL and INT interconnectors and their shippers (noting that currently no pressure service is available to BBL), and so this modification furthers relevant objective d)(i) securing of effective competition between shippers.

Self-Governance Statement: Please provide your views on the self-governance statement.

As proposed within the modification then self-governance is appropriate because the same framework is being offered to both interconnectors, so there is no discrimination issue that would warrant Authority consideration.

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

We propose to implement as soon as all three parties have completed their necessary governance processes for amending the interconnector agreement. Changes to the NG-INT agreement and NG-BBL agreement will be co-ordinated to take place on the same date so that the revised pressure service becomes effective for both parties at the same time.

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

The ongoing cost of providing the pressure service will be paid for by the party or parties (INT or BBL) that request the service. The pressure service is treated as an Excluded Service under the NTS Licence. This means it does not impact recovery of regulated revenue, it does not affect NG charges to shippers, and NG will be cost neutral to provision of the service.

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

As an enabling modification then no changes are proposed to the UNC itself. Change marked copies of the revised interconnector agreements have been provided, and we are satisfied they deliver the intent of the Solution.

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.*

n/a

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

n/a