

Representation - Draft Modification Report UNC 0771S

Removal of the absolute requirement to include a Remotely Operable Valve (ROV) Installation for all new NTS Entry connections

Responses invited by: 5pm on 13 May 2022

To: enquiries@gasgovernance.co.uk

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

Representative:	Phil Hobbins
Organisation:	National Grid NTS
Date of Representation:	12 May 2022
Support or oppose implementation?	Support
Relevant Objective:	c) Positive d) Positive
Relevant Charging Methodology Objective:	b) None c) None

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

As Proposer of this Modification, we support implementation because we believe it will deliver greater efficiency and customer choice in the process of connecting new sources of gas for delivery to the NTS. Where our formal process safety assessment concludes that an ROV installation is not a mandatory requirement for an NTS entry connection, there is potential for a material saving in the cost of connection for that customer to be realised.

We therefore agree with the statement in the Draft Modification Report that Relevant Objective (d), 'securing of effective competition between relevant shippers', would be better facilitated because lower connection costs would make NTS connection more attractive, potentially leading to greater supply diversity. We also consider that Relevant Objective (c), 'efficient discharge of the licensee's obligations' would be better facilitated; Condition 4F in the NTS Licence requires us to offer access to our system in line with the Gas Act, which in turn at paragraph 9(1)(b) requires gas transporters to comply with all reasonable connection requests and this Modification would facilitate some NTS connections to be completed at a lower cost than would otherwise be the case.

Consistent with the discussion at the Workgroup meeting of 7th April 2022, we consider that the Charging Methodology Objectives are not relevant to this Modification because it

only impacts our connection charging methodology not our transportation charging methodology.

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

We agree that this Modification should continue to be subject to self-governance procedures. The only potential challenge to this approach raised in the Workgroup was whether a material impact on safety was a possibility but as stated in the Draft Modification Report, HSE have concurred with our view that the amendment to our Safety Case to give effect to this Modification is non-material.

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

Sixteen business days after a Modification Panel decision to implement, subject to no appeal being raised.

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

None.

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

Yes.

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.*

A minor error in the Workgroup Impact Assessment on page 6; we suggest the following edit:

“At the 31 August 2021 Extraordinary Workgroup meeting, when observing that connections can be lengthy in time and costly resulting in additional costs and timeframes for the ~~consumer~~ customer, a Workgroup Participant noted that...”

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

We have nothing further to add.