

Representation - Draft Modification Report UNC 0814 (Urgent)

Temporary Access to the Enhanced Pressure Service and Increase to the Maximum NTS Exit Point Offtake Rate of the BBL interconnector

Responses invited by: **5pm on 01 August 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Ricky Hill
Organisation:	British Gas Trading Limited
Date of Representation:	01/08/22
Support or oppose implementation?	Comments
Relevant Objective:	d) None
Relevant Charging Methodology Objective:	Not Applicable

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

In principle, Centrica would support proposals to increase pressure at Bacton exit point to allow for an increased export capability and flow rate to continental Europe. However, we do not believe that sufficient analysis on the impact has been undertaken for us to support the modification at this stage. We note that the mod has been designed as a time limited measure due to the limited opportunity to carry out this type of analysis, but we nevertheless believe that there could be impacts in the short term that need to be assessed. The types of questions we would like clarity on are: 1) Is there certainty that the change would not be to the detriment of other gas flows? 2) Given that Interconnector UK has recently claimed *force majeure* due to low pressure, can NGG/Bacton facilities confidently support the proposal? 3) Would an increase in pressure create a new risk of the 'dust' issue entering the BBL filters/pipeline or result in other unexpected operational issues. 4) What contingencies are NGG proposing to ensure reliability should local or regional compressors trip/fail. 5) How would the costs be transferred to Shippers (e.g. will there be a new charge to existing bookings or only levied on additional flows)?

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

We believe any implementation should be delayed until a thorough Impact Assessment has been done.

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

As per our comments above, we are uncertain.

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.*

No further comments

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

No further comments