

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:	Terry Burke
Organisation:	Equinor UK Limited
Date of Representation:	1 st August 2022
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)

Equinor feels there is merit with the proposed modification but has concerns around the urgent nature of the process. Due to the gas quality issues that have occurred at Bacton in recent months there is a requirement to carry out robust technical analysis regarding the impact on gas quality at Bacton and the wider NTS. A shortened governance process can only be considered when this information is communicated to the wider industry. Assurance is sought that additional flows will not impose further costs on consumers and that market participants should be given sufficient notice of how the additional capacity will be sold.

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

Delayed implementation until further analysis of the full impact is understood.

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

Not possible to quantify at present

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

Not assessed

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