

**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](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Matthew Newman
<b>Organisation:</b>	National Grid NTS
<b>Date of Representation:</b>	01/08/22
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive
<b>Relevant Charging Methodology Objective:</b>	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 within the interconnector agreement between NG and BBL Company. The changes will allow for BBL to gain access to the enhanced pressure service and increase their Maximum NTS Exit Point Offtake Rate (MNEPOR) allowing them to support continental Europe with filling storage stocks ahead of this winter and ahead of winter 2023. Therefore, supporting GB security of supply by reducing the likelihood of increased and sustained export flows during the winter where GB demand will be larger. Additionally, relevant objective d)i) securing of effective competition between shippers is also being supported as BBL will be able to flow larger quantities.

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

We propose to implement as soon as possible in line with the urgency request to allow BBL to flow increased volumes and support GB and continental Europe's security of supply.

**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 there are no changes proposed to the UNC. Marked changes to BBL's Interconnector Agreement have been provided as part of the submission and we are satisfied they deliver the intended 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