

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:	Davide Rubini
Organisation:	Vitol SA
Date of Representation:	01.08.2022
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

We generally support the proposal on the back of the expectation that it will provide BBL shippers with additional transportation capacity and consequently increased available flexibility and possibly lower unitary capacity cost due to higher infrastructure utilisation. We are aware that for some the change raises concerns related to safety matters, specifically linked to the risk of delivery of solids and liquids from the NTS which may damage downstream infrastructure and have potential unintended consequences. Due to the current stressful market environment, it would be helpful if market participants are fully informed about any technical impact assessment performed so far.

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

When reasonably possible provided that all safety concerns are properly addressed and market participants are informed about additional capacity becoming available with due notice.

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

None anticipated.

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

Not applicable.

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.

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

Nothing to add.