

## Representation - Draft Modification Report UNC 0826S

### Amendment to Network Entry Provision at Shell St Fergus Terminal

Responses invited by: **5pm on 08 December 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>	Chris Wright
<b>Organisation:</b>	Esso Exploration and Production UK Limited (EPUK)
<b>Date of Representation:</b>	8 December 2022
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	a) Positive d) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

Presently, gas deliveries into the St Fergus Shell terminal are artificially constrained below the statutory upper Wobbe limit of 51.41MJ/M<sup>3</sup> by legacy network entry arrangements. Increasing the upper Wobbe limit as proposed will facilitate increased flows of gas into the GB gas network. While these additional flows may be small compared to national demand levels, they will nevertheless provide additional security of supply at a time when it is badly needed, and in doing so will tend to apply downward pressure on wholesale energy prices to the benefit of end consumers.

Aligning the Shell terminal upper Wobbe limit more closely with network entry arrangements enjoyed at other GB delivery facilities will also better secure effective competition between gas shippers, to the benefit of Relevant Objective (d).

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

We agree that this proposal should be subject to industry self-governance arrangements. It represents a small change to the upper Wobbe index at one terminal, thereby better aligning with competing terminals, and it does so on a time limited basis. The impact upon end consumers is likely to be small but positive. These benefits should be realised as quickly as possible and this is best achieved through self-governance arrangements.

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

As soon as possible.

**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?*

N/A – no change to Code legal text is required.

**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**

N/A.