

Representation - Draft Modification Report UNC 0859

Reintroduction of the enhanced pressure service and increased MNEPOR for BBLC (as introduced by UNC0814)

Responses invited by: **5pm on 15 December 2023**

To: enquiries@gasgovernance.co.uk

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

Representative:	Edward Allard
Organisation:	Cadent Gas Limited
Date of Representation:	15 th December 2023
Support or oppose implementation?	Support
Relevant Objective:	d) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

Cadent's rationale for supporting of this modification is:

1. The modification acts as an enabler and importantly, doesn't unreservedly give BBL the right to operate at an increased pressure rate. Instead, National gas will use reasonable endeavours and analyse the wider conditions of the NTS when increasing pressures, ensuring the interests of other consumers are considered.
2. The proposed increase in Maximum Network Exit Point Offtake Rate (MNEPOR) that BBL may be able to achieve (enabled by this modification) is at a rate consistent with other Bacton interconnector operators.
3. The modification is time-bound and will afford parties the opportunity to understand the impacts of BBL's access to enhanced pressures at this particular interconnector point prior to any potential enduring change.

Relevant Objective d) “*Securing Effective Competition: between relevant shippers...*” =

We believe that this modification furthers relevant objective D. We agree with the proposer’s justification for the modification furthering this relevant objective, as it would create a level playing field between BBL and INT at the Bacton Interconnector Point, promoting greater levels of competition for the available exit point capacity.

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

The modification should be implemented as soon as reasonably practical following authority decision. It is considered an enabling modification, and National Gas will use existing operating procedures (e.g., analysing wider NTS conditions) when considering any enhancement in pressure.

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

No impacts or costs identified.

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

We are satisfied that the Legal Text will deliver the intent of the 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.*

None

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

Nothing further to add.

We trust that this information will assist in the completion of the Final Modification Report.

Please contact me on 07891670444 (Edward.allard@cadentgas.com) should you require any further information.