

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:	Mariachiara Zennaro
Organisation:	British Gas Trading Ltd
Date of Representation:	15/12/2023
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)

In principle, Centrica supports the proposal to permit BBLC to increase their export capabilities at the Bacton IP initially on a temporary basis by gaining access to the enhanced pressure service and increasing MNEPOR until 31st December 2024. The modification supports/enables BBL to offer additional capacity and provides for a level playing field between Interconnector Limited (INT) & BBL.

However, our comments remain aligned to those highlighted in our [response](#) to UNC modification 0814. In particular, the modification should not increase the risk profile of the dust/particle/filter issue.

We remain supportive of National Gas Transmission implementing improved physical arrangements as soon as possible at Bacton to remedy the disparity in the risk profile to flows exporting via the INT and BBL interconnectors as a result of the dust/particle/filter issues.

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

No further comments

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

No further comments

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

No further comments

Ofgem have requested that the following questions are addressed:

Q1: Provide views/ details on the data/ information collection required from the proposed solution in order to be in a position for a decision on any future enduring solution. UNC0859S is proposed as a temporary Modification. The proposer states "This timeframe would provide sufficient time to gather data towards the longer term thinking and development of whether an enduring solution would be appropriate" [Page 3 of Modification document]. What information would you need to form a view as to whether an enduring solution is appropriate.

No further comments

Q2: Provide views on the appropriateness of the time period for the enhanced pressure service proposed by the Modification, with regards to system safety and GB security of supply. Do you consider Winter 2023/24 to be an appropriate time to implement this Modification? Please explain your reasons. If not, please state when you consider would be an appropriate time and your reasons for this.

No further comments

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 further comments

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

No further comments