

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:	Lauren Jauss
Organisation:	RWE Supply & Trading GmbH
Date of Representation:	15 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)

We recognise that other Users have raised technical concerns regarding this proposal, but at this stage that there is insufficient convincing evidence for us to oppose this modification. In general, we strongly support the principle of promoting competition and facilitating a level-playing field for Users. Therefore, on balance, we support this modification proposal in order to allow for further data gathering and analysis.

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

No comment

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?

Not reviewed

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.

We think the objective of the analysis should be to make an assessment of whether there is any change in the risk to Users and their customers of offtaking off-spec gas and/or having unplanned outages as a result. Whilst there are compensation arrangements in place, they do not usually cover the costs to Users. We think it will be important to establish where the dust particles that have been trapped by filters are originating from, and in what scenarios and at what flow velocities this becomes a problem. It may be helpful to understand the relationship between the pressure services and flow directions and velocities in the different feeder pipelines and across the Bacton Terminal to make an informed assessment. For example, we do not fully understand why the increased pressure at Kings Lynn has sometimes resulted in lower velocity flows in Feeder 27.

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 comment

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