Gas Quality Blending Service Consultation Response Form

To provide written feedback, please complete this form and email it to box.gsoconsultations@nationalgrid.com, philip.hobbins@nationalgrid.com and rachel.hinsley1@nationalgrid.com no later than 13th November 2020. Alternatively, if you wish to provide feedback verbally, please use the contact details above to make arrangements for a meeting / conference call / video conference.

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Company: Cadent

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Do you wish National Grid to keep any of the details of your response confidential? No

Consultation Questions

Service Concept and Link to GS(M)R Review	Response
1. What are your thoughts on the service concept outlined in section 3?	Minimal impact to the DN's in general but some close coupled offtakes (such as Bacton) potentially impacted
2. Do you foresee any positive or negative impacts of NGG offering such a service on your business? If so, please explain.	This could be negative if not well managed. GSMR compliance and minimum agreed pressures must be maintained at all times, including when a beach supply is constrained due to blending.
3. Do you consider there to be any risks that may arise from such a service?	Only if the processes fail and allow non GSMR compliant gas onto the network or minimum / agreed pressures are not maintained.
4. Wobbe Index and Incomplete Combustion Factor are the parameters that stakeholders have so far indicated to us could be useful to have a relaxation on as a blending service. Do you see a	n/a

need for this service to cover any other parameters and if so, which parameter(s) would you like to be considered and why?	
5. Do you consider that the GS(M)R Review negates the need for a gas quality blending service or should the topic continue to be explored?	It potentially limits the value of offering the service.
Applicable terminals	
6. Do you agree with our initial views on the categorisation of NTS entry points contained in section 4?	Yes
7. Teesside and Easington would require additional infrastructure and components to be able to offer a gas quality blending service, which would mean additional time and costs to implement. Would you support NGG further exploring this?	No if this service has a potentially short life span.
[redacted]	[redacted]
8. Do you think that the service is more suited to UKCS terminals rather than interconnectors?	n/a
Regulatory Treatment	
9. In your view, which regulatory mechanism should NGG pursue to obtain regulatory approval for this service?	Licenced activity – visible to industry and impacted parties.
10. The DFO contract with NGG may need to be amended to offer the service, do you believe this should be changed via the NEA or a different contract put in place?	Different contract to ensure clear roles and responsibilities.
11. What are your views on the suitability of UNC TPD Section I3.5 'Special Delivery Arrangements' to serve as UNC basis for NGG to offer the service? Are there additional changes you believe will be required within UNC?	n/a
Charging	
12. Who should NGG's customers be – UNC shippers or DFOs, or potentially both?	Potentially both
13. If the DFO, this would create a commercial relationship that is currently purely operational. Do	Reliance on a good contract and shipper interaction

you envisage any problems with this?	
14. Do you agree that NGG should charge for this service?	yes
15. What minimum and maximum service durations would be appropriate?	Dependant on the investment needed and any recouping of funding.
16. Please share your thoughts on whether DFOs / shippers delivering on-specification gas at a terminal where a blending service is in place should receive a share of the revenue that NGG receives from the DFO delivering off-spec gas for providing the service	n/a
17. What is the maximum lead-time that would be acceptable to you between signing up for the service and it becoming available?	n/a
18. How should we make the service available?	Interruptible basis
19. How do you anticipate the structure of the charging to work?	n/a
20. Do you consider that the service would be useful to terminal operators if it is only offered with NGG reserving the right to interrupt at short notice?	n/a
21. Do you believe that an NGG gas quality blending service would be likely to result in a benefit or detriment to security of GB gas supply? Please explain your answer.	Help in short term by widening range of gas brought to beach but only at particular locations. May constrain the future development of midstream or downstream DFO's.
22. If you wish to provide any other feedback on the issues raised in this consultation, please do so here.	This approach may be perceived to favour traditional "upstream" DFO's and offering this service at terminals only may discourage future downstream connections whose "blending headroom" has been exhausted upstream. The blending of Hydrogen as a fuelstock should be considered and managed differently to this process to avoid an unintentional skewing of the deployment of Hydrogen as a fossil gas replacement.