UNC Modification

this document in the process?

UNC 0XXX:

(Code Administrator to issue reference)

Gas Entry onto the Total system via an Independent Gas Transporter



04

At what stage is

Purpose of Modification:

This modification will facilitate gas flow into the Total System via an Independent Gas Transporters (IGT) pipeline.

Next Steps:

Please provide an initial view of the preferred governance route/pathway and impacted parties

The Proposer recommends that this Modification should be: (delete as appropriate)

- subject to Self-Governance
- assessed by a Workgroup

This Modification will be presented by the Proposer to the Panel on dd Month 202y (Code Administrator to provide date). The Panel will consider the Proposer's recommendation and determine the appropriate route.

Please consider providing a presentation to introduce the Modification to the UNC Modification Panel which should be sent with your Modification to the Joint Office (a suggested template is available at: https://www.gasgovernance.co.uk/unc/templates)

Impacted Parties:

High: Independent Gas Transporters, Distribution Network Operators.

Low: National Gas Transmission & Shippers.

None:

Impacted Codes: UNC & UNC iGTAD.

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Timetable Please provide proposer contacts and an ind will update the contents and provide any add		orransporter: SGN
Modification timetable: (amend as appropri	iate)	email address
Pre-Modification Discussed Date Modification Raised New Modification to be considered by Panel	dd month year dd month year dd month year	Systems Provider: Xoserve
First Workgroup Meeting Workgroup Report to be presented to Panel Draft Modification Report issued for consultar	dd month year	UKLink@xoserve.c
Consultation Close-out for representations Final Modification Report available for Panel Modification Panel decision	dd month year	Other: Insert name email address
	33 you.	telephone

Guidance on the use of this Template:

Please complete all sections unless specifically marked for the Code Administrator.

Green italic text is provided as guidance and should be removed before submission.

The Code Administrator is available to help and support the drafting of any modifications, including guidance on completion of this template and the wider modification process. Contact: enquiries@gasgovernance.co.uk or OTHIC 388 2107. Proposers may also wish to refer to the Volume of the Code of this template at the Code of t

1 Summary

What

The Uniform Network Code is currently silent on a situation where gas can flow into the Total System via an iGT pipeline and also from an IGT pipeline onto a Distribution Network Operator (DNO) system. This modification has been raised to address this void and establish the arrangements between the iGT, the DNO and the Delivery Facility Operator.

Why

This modification will provide an additional means for new sources of gas to be connected to the Total System. We are aware that there are a growing number of gas producers such as bio-methane producers wanting to inject new sources of gas onto the Total System and we believe that there is an opportunity to extend the market for new entry connections onto the Total System by facilitating iGTs to directly connect new sources of gas. This modification will ultimately facilitate the expansion of UK produced gas entering the Total System.

How

The Independent Gas Transporters Arrangement Document (iGTAD) and the UNC will be amended to recognise that gas can flow into the Total System via an iGT pipeline and onward through a DNO network. A tri-partite Network Entry Agreement (NEA) to facilitate gas entering the Total System from an iGT pipeline will be developed. This agreement will include the following parties - iGT, DNO and the Delivery Facility Operator (DFO). The NEA will specify the enduring arrangements between parties to facilitate gas entry. This arrangement between the iGT, DNO and DFO will establish a LDZ System Entry Point owned, operated and controlled by the DNO and established on the National Gas Transmission Gemini system accordingly. The gas will immediately flow downstream into an iGT pipeline, hence the LDZ System Entry Point will be notionally located on the DNO network.

2 Governance

Justification for Self-Governance

This Modification should be subject to Self-Governance procedures on the basis that the necessary changes would have no material impact on the commercial activities of Shipper Users, Gas Transporters or Gas Consumers. The overarching objective of the Modification is to allow new sources of gas to be entered onto the Total System by facilitating gas to flow from an iGT's pipeline onto a DNO pipeline thus allowing new sources of gas onto the Total System. The existing UNC requirements to establish Network Entry Provisions in a Network Entry Agreement will be extended to include the relevant iGT as a mandatory signatory to this NEA agreement.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup.

3 Why Change?

The UNC is silent on allowing iGTs to enter gas onto the Total System (although an iGT Licence does indicate that iGTs can convey gas through their pipes to any pipe-line system operated by another gas transporter), currently the code only acknowledges that iGTs can exit gas from the Total System via a Connection System Exit Point (CSEP) and this has been the case since the UNC was first drafted. This modification proposal will allow iGTs to transport gas from a LDZ System Entry Point notionally located on a DFO network and enter the gas into the Total System and onward via a DNO network. This modification proposal would provide an alternate option (in addition to a UIP or DNO connection) in a scenario where a DFO is located some distance from the DNO existing network and additional pipe is required to be laid so that the gas can enter the Total System.

4 Code Specific Matters

Reference Documents

Independent Gas Transporters Arrangement Document

UNC TPD Section I – 3.11.1 (a)

Network Entry Agreement

Knowledge/Skills

Understanding of the iGTAD and UNC would be advantageous

Knowledge of the iGT UNC.

5 Solution

General UNC business rules associated with the Modification.

- BR1. iGT gas entry should be defined in the iGTAD as gas entering the Total System via an LDZ
 System Entry point notionally located on a DNO network but physically connected to a iGT network.
- BR2. It is proposed that the IGTAD will be modified to require that an IGT, DNO and the DFO enter into:
 - a Tri-Party connections agreement in line with the relevant DNO's 4B Statement covering the physical connection of the iGT System onto the DNO network this will be referred to as an iGT Gas Connection Agreement.
 - a Tri-Party NEA covering the enduring arrangements (including Network Entry Provisions) associated with the LDZ System Entry Point.
- BR3. There is no intention to change the meaning of a CSEP, so all <u>existing</u> Individual System Exit Points between the DNO System and the IGT will remain collectively a single unmetered CSEP.
- BR4. Currently the UNC & IGTAD does not contemplate gas flowing from an IGT network onto a DNO network. The UNC/IGTAD should be amended to permit a bi-directional flow arrangement between the DNO and the IGT only at ISEPs which facilitate new gas entry from a Delivery Facility into the Total System.
- BR5. Existing iGT Shrinkage provisions in IGTAD will apply equally to IGT networks that facilitate gas entry into the Total System as with any other iGT network.
- BR6. The DNO will manage and operate the flow and monitoring of the gas onto the Total System in line with the tripartite NEA.

- BR7. In line with existing UNC arrangements, title and risk to the gas will pass from the iGT to the DNO on exit from the iGT's network and back to the iGT from the DNO if the gas re-enters the IGT network.
- BR8. The iGT will be permitted to facilitate gas exit points off their pipeline prior to the DNO network.
 Existing IGTAD arrangements for these ISEPs would prevail.
- BR9. iGT Gas Entry onto a DNO's Network maybe subject to fulfilling the requirements in the DNO's Licence Condition 4B statement in relation to the initial connection.

6 Impacts & Other Considerations

Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No.

Consumer Impacts

Increasing the number of gas producers and sources of gas should theoretically lower consumer prices (higher supply and unchanged demand puts downward pressure on prices), but we do acknowledge that the limited scale means any impact would be minimal.

What is the current consumer experience and what would the new consumer experience be?

No change.

Impact of the change on Consumer Benefit Areas:	
Area	Identified impact
Improved safety and reliability Will this change mean that the energy system can operate more safely and reliably	None
now and in the future in a way that benefits end consumers? This area would relate to changes which balance the system safely, securely and	
at optimum cost, particularly for consumers in vulnerable situations. No Change	

Lower bills than would otherwise be the case

Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?

This area would relate to changes that are likely to benefit end consumers. This could include any change where it has been demonstrated that it could lower bills for end consumers. It would also consider changes which introduce flexibility across the market to flow energy at the most efficient profile, lower operational costs. and make sure GB consumers can access the cheapest sources of energy.

If possible, this section should include any quantifiable benefits.

What costs or benefits will pass through to consumers?

No change

Reduced environmental damage

Will this Modification Proposal support:

- a reduction in Greenhouse Gas emissions?
- new providers and technologies?
- a move to hydrogen or lower greenhouse gases?
- the journey toward statutory net-zero targets?
- decarbonisation?

This area would relate to changes which demonstrate innovative work to design solutions which ensure the system can operate in an environmentally sustainable way both now and in the future.

Proposers must provide the impact (if any) of the Modification proposed on Greenhouse Gas Emissions, if it is likely to be material. The Proposer shall assess the quantifiable impact of such Modification in accordance with the Authority's <u>Carbon Costs Guidance</u>

We are aware that there is a growing number of Bio-methane producers wanting to inject green gas onto the total system, this modification would allow this to take place and will ultimately expand this market which will have a positive impact on Greenhouse Gas Emissions by allowing the iGT's to provide this facility

Improved quality of service

This area would focus on demonstrating why and how the change can improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient, and effective.

No change

None

Positive

None

Benefits for society as a whole	Positive	
This area would relate to any other identified changes to society, such as jobs or the economy.		
By facilitating the building of additional Bio-Methane plants there will be additional jobs and general economic activity for UK Plc.		

Cross-Code Impacts

At this stage it is not envisaged that changes will be needed to the iGT UNC as a result of this change.

EU Code Impacts

None.

Central Systems Impacts

There would be no adverse impacts to central systems as this proposal will use the existing platforms, no impacts to Gemini are expected.

7 Relevant Objectives

Impact of the Modification on the Transporters' Relevant Objectives: Relevant Objective Identified impact a) Efficient and economic operation of the pipe-line system. Positive Positive b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters. c) Efficient discharge of the licensee's obligations. None d) Securing of effective competition: None (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers. e) Provision of reasonable economic incentives for relevant suppliers to secure None that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers. Promotion of efficiency in the implementation and administration of the Code. None

g) Compliance with the Regulation and any relevant legally binding decisions of	None
the European Commission and/or the Agency for the Co-operation of Energy	
Regulators.	

AND/OR, for Section Y (Charging Methodology) Modifications

Impact of the Modification on the Transporters' Relevant Charging Methodology Objectives:

Relevant Objective		Identified impact
a)	Save in so far as paragraphs (aa) or (d) apply, that compliance with the charging methodology results in charges which reflect the costs incurred by the licensee in its transportation business;	None
aaj	 That, in so far as prices in respect of transportation arrangements are established by auction, either: (i) no reserve price is applied, or (ii) that reserve price is set at a level - (I) best calculated to promote efficiency and avoid undue preference in the supply of transportation services; and (II) best calculated to promote competition between gas suppliers and between gas shippers; 	None
b)	That, so far as is consistent with sub-paragraph (a), the charging methodology properly takes account of developments in the transportation business;	None
c)	That, so far as is consistent with sub-paragraphs (a) and (b), compliance with the charging methodology facilitates effective competition between gas shippers and between gas suppliers; and	Positive
d)	That the charging methodology reflects any alternative arrangements put in place in accordance with a determination made by the Secretary of State under paragraph 2A(a) of Standard Special Condition A27 (Disposal of Assets).	None
e)	Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

8 Implementation

As Self-Governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

9 Legal Text

Text Commentary

To be provide in due course.

Text

To be provided in due course.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Self-Governance procedures should apply.
- Refer this proposal to a Workgroup for assessment.

Document Control to be removed upon completion of the template.

Document Control Sheet

Document ID	Title	Publication Date
Stage 01	Stage 01 UNC Standard Modification Template	24 May 2021
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4.0	Helen Cuin	04 November 2020
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24 May 2021	Joint Office and Panel	20 May 2021
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	Panel	20 May 2021

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Version	Date	Review frequency	Reason for update
3.0	02 May 2019	TBC	Current published Version
3.8	04 November 2020	TBC	CACoP insertion of Consumer Benefit Areas Joint Office suggested changes and insertion of Document Control Sheet.
4.0	20 May 2021	TBC	Panel approval following insertion of Consumer Benefit Areas