

UNC Transmission Workgroup Minutes
Thursday 06 July 2023
via Microsoft Teams

Attendees		
Eric Fowler (Chair)	(EF)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Adam Bates	(AB)	SEFE Energy
Alex Nield	(AN)	Storengy
Alison Tann	(AT)	National Gas Transmission
Andrew Blair	(ABI)	Observer
Anna Shrigley	(AS)	ENI
Carlos Aguirre	(CA)	Pavilion Energy
Edd Green	(EG)	E.ON
Emma Buckton	(EB)	Northern Gas Networks
Hannah Reddy	(HR)	Xoserve
James Lomax	(JL)	Cornwall Insight
Jeff Chandler	(JCh)	SSE
Joseph Leggett	(JLe)	Interconnector
Joshua Bates	(JB)	National Gas Transmission
Julie Cox	(JCs)	Energy UK
Kirsty Appleby	(KA)	National Gas Transmission
Lauren Jauss	(LJa)	RWE
Marion Joste	(MJ)	ENI
Mariachiara Zennaro	(MZ)	Centrica
Nick King	(NK)	CNG Services
Nick Wye	(NW)	Waters Wye Associates
Ofordi Nabokei	(ON)	National Gas Transmission
Paul O'Toole	(PO)	Northern Gas Networks
Phil Hobbins	(PH)	National Gas Transmission
Richard Fairholme	(RF)	Uniper
Shiv Singh	(SS)	Cadent
Steve Mulinganie	(SM)	SEFE Energy
Terry Burke	(TB)	Equinor
Tim Davis	(TD)	TD Energy
<p><i>This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.</i></p> <p><i>Please note these minutes do not replicate detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of papers are available at: https://www.gasgovernance.co.uk/0844/010623.</i></p>		

1. Introduction and Status Review

Eric Fowler (EF) welcomed all parties to the meeting.

1.1. Approval of minutes (01 June and 05 June 2023)

EF pointed out that the meeting on 5 June had been specific for the DSR workgroups (0844 and 0845) and that the notes of that meeting had been considered in the completion of the DSR

workgroup report now out for consultation so would not need to be signed off by the Transmission meeting. The minutes of the 01 June meeting were approved.

1.2. Approval of Late Papers

EF noted some papers for the Workgroups have been received late and Workgroup agreed to accept the material.

1.3. Review of Outstanding Actions

0502: Request to be submitted to investigate apparent inconsistencies between the System Management Principles (SMPs), Licence and UNC outlining the hierarchy of the regulatory frameworks and how they should work together, with the principle being that if there is something in a lower hierarchical document that disagrees with something in a higher hierarchical document, the higher document prevails.

Update: EF drew attention to the comments provided by Julie Cox (JCx) for inclusion to the Modification 0848 - Alignment of Entry and Exit Capacity Constraint Management Provisions, Workgroup Report and published here: www.gasgovernance.co.uk/0848/060723. The commentary relates to the challenge to the accepted hierarchy of the governance framework.

When EF asked Workgroup if anyone would consider sponsoring this action JCx noted it would not be easy for anyone to adopt this action as it sits above what Workgroup 0848 is looking to resolve and that this outstanding Action and Action 0601 are linked.

JCx added that there could be specific issues within Modification 0848, but the issue stands in its own right as well.

When EF suggested this could be a possible Governance Workgroup or UNC Modification Panel issue, Steve Mulinganie (SM) suggested it should be covered by a UNC Modification Panel issue rather than Governance Workgroup. EF clarified that further debate will be held during Workgroup 0848, with a view to forwarding to the UNC Modification Panel as a matter arising from Workgroup.

Carried Forward

Action 0601: Joint Office (EF) to investigate if is within the remit of Workgroup to request Legal Advice for clarification.

Update: EF provided an update and advised that legal advice is obtained through the Networks and that a Workgroup, and/or Joint Office does not have the vires of seeking legal interpretation.

SM asked where it is documented that the ability of a Workgroup to procure advice, legal or technical, is prohibited from doing so.

Phil Hobbins (PH) suggested that the more practical issue is that legal advice comes at a cost, and how that gets shared out across the Workgroup.

SM legal drafting is provided by the Networks, the broader issue is the ability to access 3rd party technical knowledge.

SM further noted he would like to know on what basis the prohibition is. **Carried Forward**

1.4. Industry Update from Ofgem

The following update was provided to the estimated decision dates timetable published on 05 July 2023 at: <https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable>:

Workgroup noted their frustration that there was no Ofgem Representative present at the meeting, EF agreed to write to Ofgem to remind them of the importance of attending these meetings.

Post Meeting Note:

Joint Office has received communication from Ofgem representatives that should be invited to the Transmission Workgroup meetings, this has now been updated and invitations have been issued to the correct Ofgem representatives.

1.5. Pre-Modification discussions

1.5.1. Distribution to NTS Gas Flow

Proposer: Tim Davis

Tim Davis (TD) advised Workgroup of an Ofgem statutory consultation which has started (06 July 2023) [Notice of statutory consultation on a proposal to modify the standard conditions of the Gas Transporter licence that we are minded to grant to CNG Services Ltd.](#)

Addressing the presentation provided, TD explained that Modification 0808 – Reverse Compression, addresses within DN Reverse Compression where an IGT installs a compressor, but opportunities have been identified for reverse-compression to the NTS from an IGT which would involve moving gas through a connection from a Distribution Network to National Transmission for the first time.

There are currently six projects that want to have reverse-compression into the NTS from the Distribution Network, TD clarified there is nothing in the Uniform Network Code that says this sort of arrangement cannot happen.

PH advised they have had some initial discussion on the concept and from an environmental point of view it is certainly an initiative that National Gas Transmission would support but they require more detail, such as:

- at what point do traditional NTS arrangements be relaxed to enable this type of connection;
- would it be classified as a new type of connection point?
- energy balancing considerations;
- capacity arrangements.

TD explained that the arrangements being proposed seek to relieve short-duration constraints on the distribution system. For example, an anaerobic digester plant cannot be easily turned down so it will still produce gas even if the demand on the local system is low such as during a summer night. If the gas cannot be transported away, then it would need to be flared.

TD clarified six projects want to go ahead and build but there is not sufficient capacity in the relevant distribution system unless a short relief pipeline is used. These projects would be built if they could move gas onto the Network when the local distribution system has insufficient capacity.

JCx sought clarification that this would be a new connection between IGT and NTS with no other gas injection points, just the movement of gas between two Transporters.

When PH asked if the entry point would need to be bi-directional, TD advised it could be, but there are currently no plans for anything to be bi-directional.

SM sought clarification that using the flexibility of the NTS to relieve the constraint in the Distribution Network, allows the gas to flow and the avoidance of flaring. He said, assuming the beneficiary is the distribution network and that presumably, they pay for it as well, in which case SEFE Energy are fully supportive.

TD clarified that the gas goes from the IGT having come out of the Distribution Network; the amount coming out of the Distribution Network equals the amount going into the IGT. The use of the reverse compression is only likely to be for a few hours so the total quantity

of gas is likely to be small in comparison with the offtake of a DN because a biomethane plant typically has a flow of around 700scmh which is probably de minimus.

TD suggested a worked example:

- DNO flows at 100 units;
- An extra 10 is required;
- IGT move 10 into NTS and count that as a 'negative flow' for the DN

TD suggested that the flow from the IGT to NTS could be considered to use negative entry capacity. EF asked whether the proposal might be seeking to carve out a simplified set of UNC rules that would apply only for such small flows and if so, then what criteria might be needed to identify a different class of connection. TD suggested that the arrangements might be resolved with appropriate agreements between network operators.

TD asked if Shippers are happy for CNG to progress discussions with NGT without raising a Modification if there is no impact on Shippers. Workgroup members agreed the best way to progress with this is for CNG to have offline discussions with National Gas Transmission and provide a report back to Transmission Workgroup in September 2023 with more detail.

EF agreed it is worth having some exploratory conversations with the Networks to progress any stumbling blocks.

New Action: Tim Davis (TD), rather than raising a Modification, to have offline discussions with National Gas Transmission and report back to Transmission Workgroup in September 2023.

1.5.2. Remove the UNC text in Section J regarding Offtake rights and obligations associated with capacity holding

Proposer: Lauren Jauss

Referring to her presentation published on the meeting page here: www.gasgovernance.co.uk/TX/060723, Lauren Jauss (LJa) introduced a pre-modification for the removal of redundant text in TPD Section J Exit Requirements; Section I Entry Requirements that relate to capacity holding and offtake rights.

LJ noted that these clauses are unhelpful and not consistent with the rest of the Code and her Modification would make it accurate. She noted she intends to raise the Modification as soon as possible and would like Workgroup feedback on what is best to propose.

Shiv Singh (SS) advised he would like to look at the proposal in more detail before commenting.

Workgroup agreed that this pre-modification should be aired at Distribution Workgroup where there are more Transporters present.

Post Meeting Note:

Joint Office have advised the Chair and Secretary for Distribution Workgroup for the agenda to be updated.

New Action 0702: Lauren Jauss (LJa) to present pre-Modification, *Remove the UNC text in Section J regarding Offtake rights and obligations associated with capacity holding*, to Distribution Workgroup for feedback and provide an update to Transmission Workgroup.

Workgroup discussed the importance of understanding the context as to why the text highlighted is no longer relevant and PH noted he would prefer more rationale as to why the text is superfluous.

Joshua Bates (JB) provided the same sentiments as PH and said how legislation is set up as a baseline of what the NTS is supposed to do, and then more flexibility is added which outlines the importance of understanding the context of the suggested removal.

Nick Wye NW commented that the wording does not appear to reflect what happens and it is important to understand why it is put there and also to understand whether or not any of these restrictions have been used and under what circumstances.

It was suggested the Modification could be raised as Self-Governance until further Workgroup discussions are held.

1.5.3. Shipper notification about option exercise for Customer DSR

Proposer: Steve Mulinganie

SM introduced a pre-Modification which will require National Gas to notify the relevant Shipper if a Customer Demand Side Response option is exercised.

SM noted that he does not wish to delay the progression of *Modification 0844 - Enabling Direct Contractual Arrangements with Consumers for Demand Side Response*, and *Modification 0845 - Enhancements to Demand Side Response (DSR) Arrangements including a D-5 Product*, which are currently within Consultation and will be reporting to July 2023 UNC Modification Panel and therefore will be submitting this Modification to the August 2023 UNC Modification Panel meeting.

JCx offered that some offline discussions have taken place on DSR which SM may wish to include in his Modification relating to Winter Average Demand which the Shipper needs to be notified about as National Gas Transmission (NGT) calculates this and informs the Consumer, but unsure if NGT notifies the Shipper.

In considering this, SM advised he would like to keep this Modification quite focussed which JCx accepted.

PH clarified that NGT will advise the party they are contracted with and not the Shipper and noted that the NGT Modifications are very clear that due to the risks, from a practical and gas security point of view, NGT would not be offering to notify the Shipper. He advised that the Control Room would be required to increase their activity and remain more focussed on the activities at hand when there is a national supply deficit. PH further noted that exercising a DSR will have an effect on the quantity of demand the consumer will be wanting to take and that natural communications between the Shipper and the consumer should take place.

SM concluded the pre-Modification discussion by confirming the Modification will be submitted to the August 2023 UNC Modification Panel.

2. GS(M)R Review

No update.

3. Transmission Horizon Plan

Kirsty Appleby (KA) took the Workgroup through the National Gas Transmission Change Horizon plan which details:

0761 - Arrangements for Interconnectors with additional Storage capability which remains subject to change.

0823 – Amendment to the Allocation of Entry Capacity and Flow Quantities to Qualifying CNCCD Routes, expecting an Ofgem decision date in December 2023.

Gemini Sustain Plus

The start of monthly sessions dedicated to Sustain Plus Focus Groups, the first one, a face-to-face meeting on 21 September at the Delta Hotel in Warwick. Invitations will be issued shortly.

For more information please see:

<https://www.xoserve.com/change/investment-change/gemini-changes-overview/gemini-sustain-plus>

4. Workgroups

The following Workgroup meetings took place:

4.1. 0846 - Use of Entry Capacity Holdings at Easington at the Rough Storage ASEP in Winter 2023/2024

(Report to Panel 17 August 2023)

<https://www.gasgovernance.co.uk/0846>

4.2. 0848 - Alignment of Entry and Exit Capacity Constraint Management Provisions

(Report to Panel 17 August 2023)

<https://www.gasgovernance.co.uk/0848>

5. Issues

No new issues have been identified.

6. Any Other Business

6.1. PH highlighted that the two DSR Modifications (0844 and 0845) are currently within consultation which closes on 13 July 2023.

If Modification 0844 is approved, there will be a Draft DSR Contract consultation.

6.2. It was highlighted that Request 0835R – Review of Gas Demand Side Response Arrangements may not be ready to resume Workgroup discussions in September 2023, this may require movement to October 2023.

7. Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Time / Date	Paper Publication Deadline	Venue	Programme
10:00 Thursday 03 August 2023	5 pm Wednesday 26 July 2023	Microsoft Teams	Standard Transmission Workgroup Agenda
10:00 Thursday 07 September 2023	5 pm Wednesday 30 August 2023	Microsoft Teams	Standard Transmission Workgroup Agenda
10:00 Thursday 05 October 2023	5 pm Wednesday 27 September 2023	Microsoft Teams	Standard Transmission Workgroup Agenda
10:00 Thursday 02 November 2023	5 pm Wednesday 25 October 2023	Microsoft Teams	Standard Transmission Workgroup Agenda
10:00 Thursday 07 December 2023	5 pm Wednesday 29 November 2023	Microsoft Teams	Standard Transmission Workgroup Agenda

Transmission Workgroup Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
0502	04/05/23	1.5.2	Request to be submitted to investigate apparent inconsistencies between the System Management Principles (SMPs), Licence and UNC.	TBC	Sponsor Required	Pending Sponsor
0601	01/06/23	1.3	Joint Office (EF) to investigate if is within the remit of Workgroup to request Legal Advice for clarification	July 2023	Joint Office (EF)	Carried Forward
0701	05/07/23	1.5.1	Tim Davis (TD), rather than raising a Modification, to have offline discussions with National Gas Transmission and report back to Transmission Workgroup in September 2023.	September 2023	Tim Davis (TD)	Pending
0702	05/07/23	1.5.2	Lauren Jauss (LJa) to present pre-Modification, <i>Remove the UNC text in Section J regarding Offtake rights and obligations associated with capacity holding</i> , to Distribution Workgroup for feedback and provide an update to Transmission Workgroup	August 2023	Lauren Jauss (LJa)	Pending

**UNC Workgroup 0846 Minutes
Use of Entry Capacity Holdings at Easington at the Rough Storage
ASEP in Winter 2023/2024**

Thursday 06 July 2023

via Microsoft Teams

Attendees		
Eric Fowler (Chair)	(EF)	Joint Office
Helen Bennett (Secretary)	(HB)	Joint Office
Adam Bates	(AB)	SEFE Energy
Alex Nield	(AN)	Storengy
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Hannah Reddy	(HR)	Xoserve
James Lomax	(JL)	Cornwall Insight
Jeff Chandler	(JCh)	SSE
Joseph Leggett	(JLe)	Interconnector
Joshua Bates	(JB)	National Gas Transmission
Julie Cox	(JCs)	Energy UK
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Marion Joste	(MJ)	ENI
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Richard Fairholme	(RF)	Uniper
Shiv Singh	(SS)	Cadent
Steve Mulinganie	(SM)	SEFE Energy
Terry Burke	(TB)	Equinor

This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.

Please note these minutes do not replicate detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of papers are available at: <https://www.gasgovernance.co.uk/0846/050723>.

1.0 Introduction and Status Review

1.1. Approval of Minutes (01 June 2023)

The minutes were approved.

1.2. Approval of Late Papers

There were no late papers.

1.3. Review of Outstanding Actions

None to review

2.0 Amended Modification

The Proposer's representative, Nick Wye (NW) provided an update to the amendment made to the Modification which is now v2.0 dated 09 June 2023.

How Section

NW explained, the original *Modification 0817 - (Urgent) - Treatment of Existing Capacity Holding at Easington on creation of the new Rough Storage ASEP*, implemented last winter (2022) allowed the ability for Centrica to utilise the proposed solution for the treatment of existing capacity holdings at Easington. Further investigations have concluded that no capacity has been bought since 2017 at Easington, therefore, the amendment to the Modification now includes the ability for all Users to utilise the proposed solution.

Legal Text Commentary

The Legal Text provided is the same as that used for Modification 0817 with the exception of now allowing all Users to benefit from this Modification. This Modification will, if implemented, be for this coming winter (2023) with the addition of all Users.

3.0 Development of Workgroup Report

In undertaking a detailed onscreen review of the draft Workgroup Report, EF completed amendments in-line with the feedback provided by those Workgroup participants in attendance, this included the following sections:

- **Impact Assessment**
- **Workgroup response to the Rough Order of Magnitude (ROM)**

Workgroup agreed with the Proposer representative that as Modification 0817 was a transitional arrangement, this proposal is also transitional and therefore, Option 1 should be the approach taken.

- **Panel Question**

The Panel Question was addressed within the Workgroup Assessment discussion held on 01 June 2023.

- Workgroup Assessment
- Workgroup Assessment of Relevant Objectives

With regards to Relevant Objective C, Phil Hobbins (PH) noted he recognises there may be efficiency in terms of governance, but does not see how, as a Transporter, this Modification will encourage NTS to discharge their obligations more efficiently. EF noted this in the Workgroup Report.

EF noted, as Workgroup had nothing further to add, the Modification will be presented 1-month early to the July 2023 UNC Modification Panel.

Post-meeting note:

The completed Workgroup Report v1.0, dated 06 July 2023, has now been published and can be viewed here: www.gasgovernance.co.uk/0846.

4.0 Next Steps

Report to UNC Modification Panel, 1-month early, 20 July 2023.

5.0 Any Other Business

6.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
No more meetings planned			

0846 Workgroup Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
No outstanding actions						

UNC Workgroup 0848S Minutes Alignment of Entry and Exit Capacity Constraint Management Provisions

Thursday 06 July 2023

via Microsoft Teams

Attendees		
Eric Fowler (Chair)	(EF)	Joint Office
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<p><i>This Workgroup meeting will be considered quorate provided at least two Transporter and two Shipper User representatives are present.</i></p> <p><i>Please note these minutes do not replicate detailed content provided within the presentation slides, therefore it is recommended that the published presentation material is reviewed in conjunction with these minutes. Copies of papers are available at: https://www.gasgovernance.co.uk/0844/010623.</i></p>		

1.0 Introduction and Status Review

1.1. Approval of Minutes (01 June 2023)

The minutes were approved.

1.2. Approval of Late Papers

There were no late papers.

1.3. Review of Outstanding Actions

None to review

2.0 Amended Modification

In the absence of the Proposer (Phil Lucas), Phil Hobbins(PH) provided an overview of the minor amendments to the language used throughout the Modification which are clearly marked in the Draft Amendments for Workgroup Review document published on the meeting page here: www.gasgovernance.co.uk/0848/060723.

Legal Text

PH explained a new paragraph will be added to TPD Section B – System Use and Capacity 3.8.8 which will clarify that NGT shall be able to apply and take such steps as are in accordance with the System Management Principles Statement to manage an exit capacity constraint similar to the provisions relating to an entry capacity constraint.

This will mirror the existing rules for Exit.

3.0 Development of Workgroup Report

Referring to the commentary provided for inclusion in the Workgroup Report, Julie Cox (JCx) noted that much of the subject matter has been discussed at previous meetings and the principle of the hierarchy of governance is that the higher document in the hierarchy prevails.

JCx advised that one of the challenges being made here is in relation to the apparent inconsistencies in the Licence, for example, where there are requirements and obligations for NGT to release capacity but also an obligation to establish a capacity release methodology.

The other challenge is in relation to the principles of governance. This Modification, in particular, refers to documents that sit below the UNC (in terms of hierarchy), but because they are also called up in the Licence there is no mechanism for Shippers to propose changes so in effect, they sit at a higher level than UNC.

It was noted that, historically when Shippers have wanted to change the Exit Capacity Release methodology, a Modification has had to be raised.

Nick Wye NW agreed with the comments made by JCx and noted that the UNC is the principal contract, the conflict with a supporting document is that it should be referring to the UNC rather than the other way around.

Workgroup provided positive support to the points made by JCx.

EF proposed to include the wording (of the published note) in its entirety in the Workgroup Report noting this is a feature that is broader across the governance regime.

In undertaking a detailed onscreen review of the draft Workgroup Report, EF noted amendments in-line with the feedback provided by those Workgroup participants in attendance.

Section 6 – Impacts & Other Considerations:

Impact of the change on Consumer Benefit Areas

JCx advised there is commentary addressing this section in her published document and noted that *the Impact of the change on Consumer Benefit Areas* is at best uncertain in respect of the improved quality of service. A counter to the proposer's positive view of withholding capacity for sale at the day-ahead stage is that it may be identified later on as a bad decision. It may result in overrun revenue because not selling capacity does not stop Users from flowing so the effect on consumers' bills may not be positive.

Lauren Jauss (LJa) noted that restricting capacity release is set out in the System Management Principles Statement as the right thing to do as it should encourage the right behaviours, however, she does not believe it is the right thing to do because it may result in more inefficient arrangements.

PH advised that the *Lower bills than would otherwise be the case* section suggests this MAY result in additional costs of System Operation and recognises this is a National Gas Transmission view only. If that is the expectation the consequence of releasing more capacity would mean NGT would have to buy back, at a premium.

Alison Tann (AT) reiterated comments made by PH advising, in reality, National Gas Transmission would not withhold exit capacity unless there is a very clear prospect there would be a problem, otherwise, capacity will be released. In the event that something changes operationally, National Gas Transmission would withhold capacity but only if it is forecasting that pressures in the system will not be safe.

A Workgroup Participant noted that the section *Improved Quality of Service* has been listed as positive but National Gas Transmission has earlier said this Modification will not change anything and the narrative in the Modification should therefore be neutral.

Relevant Objectives

JCx suggested that certain parts of her commentary can be set against this section and Workgroup can then agree or disagree with the comments.

Steve Mulinganie (SM) noted that Relevant Objective f) has not been set as positive by the proposer. JCx suggested this Relevant Objective should be listed as negative as this Modification is undermining Code so cannot be positive. It is saying that Code is a lesser document than we all thought it was.

When SM asked the Proposer to provide some narrative for Relevant Objective f), PH noted it is for Workgroup participants to identify any Relevant Objective impacts, whether they are positive or negative. EF proposed to insert the Workgroup commentary even if the Proposer had not specifically identified this relevant objective in the Modification justification.

4.0 Next Steps

- Proposer to formally submit an amended Modification.
- Chair to amend, in line with discussions, and publish the draft Workgroup Report for Workgroup to review ahead of the next meeting.

5.0 Any Other Business

None raised.

6.0 Diary Planning

Further details of planned meetings are available at: www.gasgovernance.co.uk/events-calendar/month

Workgroup meetings will take place as follows:

Time / Date	Paper Publication Deadline	Venue	Programme
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10:00 Thursday 03 August 2023	<i>5 pm Wednesday 26 July 2023</i>	Microsoft Teams	Review of Legal Text Completion of Workgroup Report
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0848S Workgroup Action Table						
Action Ref	Meeting Date	Minute Ref	Action	Reporting Month	Owner	Status Update
No outstanding actions						