

Representation - Draft Modification Report UNC 0842

Gas Entry onto the Total system via an Independent Gas Transporter

Responses invited by: **5pm on 26 January 2024**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	David Mitchell
Organisation:	Scotland Gas Networks Plc & Southern Gas Networks Plc
Date of Representation:	12/01/24
Support or oppose implementation?	Support
Relevant Objective:	a) Positive b) Positive
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

As proposer of this modification SGN supports its implementation as it will facilitate gas flow into the total system from an Independent Gas Transporter (iGT) pipeline via a Distribution Network Operator (DNO) network. Currently the Uniform Network Code is silent on a situation where gas can flow onto the Total System from a DNO via an iGT pipeline, hence this modification will address this gap by establishing the necessary arrangements between the iGT, the DNO and the Deliver Facility Operator (gas producer). This modification will align to the requirements of the Green Gas Support scheme, which requires gas to be entered into a licensed gas Transporters network by facilitating iGT's to lay a pipeline to enter gas, therefore this modification ultimately supports the expansion of UK produced gas entering the Total System via a DNO Network.

In order for the gas to enter the Total System the DNO, IGT and the gas production operator will enter into an agreement to manage and operate the gas composition, flow and metering of the gas ultimately onto the Total System and this process will use existing industry systems and infrastructure.

This modification will facilitate relevant objective a) The efficient and economic operation of the pipeline system by using the existing system infrastructure and it will also discharge relevant objective b) Co-ordinated efficient economic operation of the combined pipeline system and /or the pipeline system of one or more other relevant gas transporters as Gas Producers wanting to inject new sources of gas onto the Total System will be able to use and iGT to provide this service.

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

This modification can be implemented as soon as practicable following an authority decision to do so, however we are mindful that iGT UNC modification 0172 also needs to be considered and implemented by the authority therefore we would recommend that both modifications are considered and implemented in parallel.

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

If this modification is implemented, we expect that any development and ongoing cost will be minimal.

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

As proposer of this modification, we have worked closely with the lawyers to produce the legal text therefore we are satisfied that the legal text will deliver the solution.

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.*

There are no errors or omissions that we are aware of in the modification report.

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

During the development of this modification, it was identified that there wouldn't be any impacts to Central Systems such as UK Link and Gemini therefore this process can use the existing IT systems without the need for any costly change or extended system development periods.