










UNC Modification	At what stage is this document in the process?
<h1 data-bbox="132 320 657 412">UNC 0842:</h1> <h2 data-bbox="132 450 1150 589">Gas Entry onto the Total system via an Independent Gas Transporter</h2>	<div data-bbox="1209 309 1469 629"> <div data-bbox="1209 309 1469 383">01 Modification</div> <div data-bbox="1209 383 1469 456">02 Workgroup Report</div> <div data-bbox="1209 456 1469 530">03 Draft Modification Report</div> <div data-bbox="1209 530 1469 629">04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>This Modification will facilitate gas flow into the Total System via an Independent Gas Transporters (IGT) pipeline.</p>	
<p>Next Steps:</p> <p>The Proposer recommends that this Modification should be:</p> <ul style="list-style-type: none"> subject to Self-Governance assessed by a Workgroup <p>This Modification will be presented by the Proposer to the Panel on 20 April 2023. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>	
<p>Impacted Parties:</p> <p>High: Independent Gas Transporters, Distribution Network Operators.</p> <p>Low: National Gas Transmission & Shippers.</p>	
<p>Impacted Codes: UNC & UNC IGTAD.</p>	

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Timetable		
Modification timetable:		Contact: Joint Office of Gas Transporters
Pre-Modification Discussed	23 March 2023	 enquiries@gasgovernance.co.uk
Date Modification Raised	29 March 2023	 0121 288 2107
New Modification to be considered by Panel	20 April 2023	Proposer: David Mitchell SGN
First Workgroup Meeting	27 April 2023	 david.mitchell@sgn.co.uk
Workgroup Report to be presented to Panel	17 August 2023	 07760 223655
Draft Modification Report issued for consultation	18 August 2023	Transporter: SGN
Consultation Close-out for representations	11 September 2023	 david.mitchell@sgn.co.uk
Final Modification Report available for Panel	12 September 2023	 telephone
Modification Panel decision	21 September 2023	Systems Provider: Xoserve
		 UKLink@xoserve.com

1 Summary

What

The Uniform Network Code (UNC) is currently silent on a situation where gas can flow into the Total System via an IGT pipeline and also from an IGT pipeline into 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 to allow this flow.

Why

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 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 wider 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 into the DNO system. 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 into 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 alternative option (in addition to a Utility Infrastructure Provider) 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 (IGTAD)

UNC TPD Section I – 3.11.1 (a)

Network Entry Agreement (NEA)

Knowledge/Skills

Understanding 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 an 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 Gas Transporters Licence Condition 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 (GCA).
 - 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 existing 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 may be subject to fulfilling the requirements in the DNO's Gas Transporters 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?

There is no identified impacts on Significant Code Reviews or other significant industry change projects.

Consumer Impacts

Increasing the number of gas producers and sources of gas should theoretically lower consumer prices by increasing competition (higher supply and unchanged demand puts downward pressure on prices), but it is acknowledged 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
<p>Improved safety and reliability</p> <p>No Change as the new sources of gas would not materially improve the security of supply.</p>	None
<p>Lower bills than would otherwise be the case</p> <p>No change as the additional sources of gas would not be material in volume.</p>	None
<p>Reduced environmental damage</p> <p>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</p>	Positive
<p>Improved quality of service</p> <p>No change identified.</p>	None

<p>Benefits for society as a whole</p> <p>By facilitating the building of additional Bio-Methane plants there will be additional jobs and general economic activity for UK Plc.</p>	Positive
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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. It is recommended that this is confirmed during Workgroup Assessment of the proposed Modification.

EU Code Impacts

None.

Central Systems Impacts

There would be no adverse impacts to central systems as this Modification will use the existing Central System 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
b) Coordinated, efficient and economic operation of <ul style="list-style-type: none"> (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters. 	Positive
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: <ul style="list-style-type: 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. 	None
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	None
g) 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

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
aa) That, in so far as prices in respect of transportation arrangements are established by auction, either: <ul style="list-style-type: none"> (i) no reserve price is applied, or (ii) that reserve price is set at a level - <ul style="list-style-type: none"> (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
This modification will facilitate the effective competition between relevant Shippers and between relevant Suppliers by ultimately facilitating the expansion of UK produced gas entering the Total System by allowing IGTs to enter gas onto the Total System.	

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.