At what stage is this **UNC Draft Modification Report** document in the process? UNC 0787S: 01 Modification 02 Workgroup Report Introducing amendments to the Draft Modification Report interconnection agreement with Final Modification Interconnector Limited to reflect latest operational standards and

Purpose of Modification:

practices

This is an enabling Modification which will allow National Grid to amend the interconnection agreement (IA) with Interconnector Limited (IL). This will allow the IA to reflect latest standards and practices in gas quality and general operations.

Next Steps:

This Draft Modification Report is issued for consultation responses at the request of the Panel. All parties are invited to consider whether they wish to submit views regarding this Self-Governance modification.

The close-out date for responses is 18 January 2022, which should be sent to enquiries@gasgovernance.co.uk. A response template, which you may wish to use, is at www.gasgovernance.co.uk/0787.

The Panel will consider the responses and agree whether or not this Self-Governance modification should be made.

Impacted Parties:

Low: Interconnector Ltd.; National Grid; Shippers

Impacted Codes: None.

Joint Office of Gas Transporters

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Timetable

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Implementation

10 Recommendations

Legal Text

Modification timetable:				
Pre-Modification Discussed	02 September 2021			
Date Modification Raised	12 September 2021			
New Modification to be considered by Panel	21 October 2021			
First Workgroup Meeting	04 November 2021			
Workgroup Report to be presented to Panel	16 December 2021			
Draft Modification Report issued for consultation	16 December 2021			
Consultation Close-out for representations	18 January 2022			
Final Modification Report available for Panel	19 January 2022			
Modification Panel decision	17 February 2022			



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1 Summary

What

Changes to the Interconnection Agreement (IA) between National Grid Gas (NGG) and Interconnector Limited (INT) are being proposed. These changes relate to network exit provisions and are designed to bring the agreement up to date with latest standards and preferred ways of working between operators. Amendments relate to gas quality, flow rates, PRISMA, and communications between operators. (note: changes to pressure arrangements will be covered independently in a separate UNC Modification Proposal.)

Why

The changes can largely be characterised as a rationalisation and simplification of the existing text. This will make the document more reflective of current operational practises and allow the agreement to move to preferred standards. This will improve the functioning of the document.

How

This Modification Proposal provides the governance for the proposed changes in accordance with UNC European Interconnector Document (EID) A4.1.3(b). This states that 'National Grid NTS will not agree with the Adjacent TSO to amend the Relevant Interconnection Provisions in relation to an Interconnection Point except...pursuant to a Code Modification which authorises such agreement'.

2 Governance

Justification for Self-Governance

This is a facilitating modification and requires no changes to the UNC. NGG believes that none of the changes proposed within the IA are of sufficient materiality to warrant Authority intervention, and therefore self-governance is proposed.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- proceed to Consultation.

3 Why Change?

The changes can largely be characterised as a simplification and rationalisation of the existing text. This will make the document more reflective of current operational practises and allow the agreement to move to preferred standards (e.g. with gas quality). Not changing the IA will leave some parts out of date, and the document will be sub-optimal with regards to documenting the processes between the operators. This change will therefore improve the functioning of the document.

4 Code Specific Matters

Reference Documents

None.

Knowledge/Skills

None.

5 Solution

Amend the IL Interconnection Agreement.

Overview of changes (for info)

ARIA 2021 Ref	Proposed Drafting Change	Comment
General	Change of company name from "Interconnector (UK) Limited" to "Interconnector Limited" and use of "Interconnector" in place of "IUK"	
Annex A-2 Gas Entry Conditions Table A	Water Dewpoint units changed from "from 1 to 69 barg" to "at 69 barg"	To correct technical units.
Annex A-2 Odour	Deletion of previous paragraph 3 on "Odour"	Paragraph is obsolete as NTS is now unodourised.
Annex B-1 Network Exit Provisions: General and Interpretation - para 4.2	Deletion of reference to paragraph 2.2 of Annex B-3	Cross referenced paragraph is now deleted.
Annex B-2 Gas Quality para 1.1	Deletion of reference to payment	King's Lynn compressors only run to support pressure.
Annex B-2 para 1.2	Deletion of reference to payment	King's Lynn compressors only run to support pressure.
Annex B-2 old paras 1.3 & 1.4	Deletion of previous paragraphs 1.3 and 1.4	Considered no longer relevant for IA and no similar language in other IAs.
Annex B-2 old para 1.6	Deletion of reference to forecasts of WI and CV.	Obsolete and no longer required.
Annex B-2 Table A	Max temperature limit changed to 38°C	To correct previous typo.
Annex B-2 Table A	Water Dewpoint units changed from "from 1 to 69 barg" to "at 69 barg"	To correct technical units.

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ARIA 2021 Ref	Proposed Drafting Change	Comment
Annex B-2 para 3	Updated text to reflect current operating arrangements and limitations on carbon dioxide	
Annex B-2 old paras 6 to 8	Deletion of references to payment and hydrocarbon dewpoint	Text is now obsolete.
Annex B-4 Flow Rate Rules	Title changed to Flow Rate Rules	To better reflect content and consistency with other IAs.
Annex B-4 para 1.5	Updated drafting to reflect deletion of the definition of "Curtailment Notice".	To better reflect current operational practises.
Annex B-4 para 1.6	Deletions and amendments to defined terms used in Annex B-4.	
Annex B-4 para 2	Renamed as "Offtake Profile Notice" and various updates to reflect actual operational practise.	Drafting simplified significantly as a general update and to reflect actual operational practise.
Annex B-4 Appendix A	Deleted as template also used in Annex G-1 Schedule C	To avoid inconsistency in template forms.
Annex C Measurement Provisions	Updates for technical reasons and for drafting clarity and consistency: "Primary Meters" becomes "Flow Measurement Equipment"; "verification" becomes "validation"; Inclusion of additional references to ISO standards. Updated diagram in Appendix 1.	
Annex D Capacity para 1.1 & 4.2(a)	Deletion of definition of "Common Services" and "Services", as they no longer fit the revised Service Contract with PRISMA.	PRISMA have implemented a new TSO Service Contract changing the definition of services offered to TSOs
Annex D para 4.3(g)	New text to recognise INT has implemented PRISMA Secondary for transfers and surrenders	
Annex E Nominations and Matching - old para 2	Deletion	Text now obsolete.

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

This is an operator to operator agreement that is not expected to have any direct impact upon consumers but noting the consumer benefit identified below.

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

This is an operator to operator agreement that is not expected to have any direct impact upon consumer experience, but noting the consumer benefit identified below.

Impact of the change on Consumer Benefit Areas:			
Area	Identified impact		
Improved safety and reliability n/a	None		
Lower bills than would otherwise be the case Moving the operator – operator interconnector agreement to the latest standards and practices should improve the effective operation of a mid-stream part of the value chain.	Positive		
Reduced environmental damage n/a	None		
Improved quality of service n/a	None		
Benefits for society as a whole n/a	None		

Cross-Code Impacts

None.

EU Code Impacts

None.

Central Systems Impacts

None.

Panel Questions

None raised

Workgroup Impact Assessment

Workgroup participants did not disagree with the assessments presented above. An Interconnector workgroup participant supported this proposal as it better aligns the agreement with operational practice and thereby simplifies current operations.

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.	None	
b) Coordinated, efficient and economic operation of	Positive	
(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 that the domestic customer supply security standards are satisfied as	None	
respects the availability of gas to their domestic customers.		
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	None	
Regulators.		

This Modification will allow for improved co-ordination with an adjacent operator, hence facilitating efficient operation of the NTS.

Workgroup participants did not disagree.

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

No changes to UNC

Text

No changes to UNC, however a draft IA has been published alongside this report.

10 Recommendations

Panel's Recommendation to Interested Parties

The Panel have recommended that this report is issued to consultation and all parties should consider whether they wish to submit views regarding this Self-Governance Modification.