UNC Workgroup Report

At what stage is this document in the process?

UNC 0787S:

Modification

Workgroup Report

Draft Modification Report

Final Modification 04

Introducing amendments to the interconnection agreement with Interconnector Limited to reflect latest operational standards and practices

Purpose of Modification:

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:

The Workgroup recommends that this modification should be subject to Self-Governance

The Panel will consider this Workgroup Report on 16 December 2021. The Panel will consider the recommendations and determine the appropriate next steps.

Impacted Parties:

Low: Interconnector Ltd.; National Grid; Shippers

Impacted Codes: None.

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Timetable

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	17 December 2021	
Consultation Close-out for representations	11 January 2022	
Final Modification Report available for Panel	12 January 2022	
Modification Panel decision	20 February 2022	



Systems Provider: Xoserve



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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	Proposed Drafting Change	Comment
Ref 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.

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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(i) the combined pipe-line system, and/ or(ii) the pipe-line system of one or more other relevant gas tra	Positive ansporters.	
c) Efficient discharge of the licensee's obligations.	None	
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportal arrangements with other relevant gas transporters) and relevant gas transporters.		
e) Provision of reasonable economic incentives for relevant sup that the domestic customer supply security standards are s respects the availability of gas to their domestic customers.		
f) Promotion of efficiency in the implementation and administration	tion of the Code. None	
g) Compliance with the Regulation and any relevant legally bind the European Commission and/or the Agency for the Co-ope 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

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that this Self-Governance modification should proceed to consultation.