UNC Workgroup Report At what stage is this document in the process? O1 Modification O2 Workgroup Report Page 101 Modification O3 Draft Modification Report O4 Final Modification O4 Final Modification

Purpose of Modification:

UNC Modification 0755S - Enhancement of Exit Capacity Assignments was approved for implementation on 15 July 2021. That Modification allowed for the application of the Assignment process to Unbundled Capacity at Interconnectors and is due to be implemented in Spring 2022. This Modification amends the European Interconnection Document to remove the barrier between UNC and CAM NC compliance allowing full implementation of UNC 0755S and makes a minor change to clarify the Legal Text.

Next Steps:

The Workgroup recommends that this Modification should not be subject to Self-Governance The Panel will consider this Workgroup Report on 17 February 2022. The Panel will consider the recommendations and determine the appropriate next steps.

Impacted Parties:

High: N/A Low: N/A

None: All Users

Impacted Codes:

Uniform Network Code (UNC)

European Interconnection Document (EID)

Version 0.1

27 January 2022

| Contents | | Any |
|---|--------------------------------------|--|
| Summary Governance Why Change? Code Specific Matters Solution Impacts & Other Considerations Relevant Objectives Implementation Legal Text Recommendations | 3 3 4 4 4 6 6 7 | questions? Contact: Joint Office of Gas Transporters enquiries@gasgove rnance.co.uk O121 288 2107 Proposer: Daniel Hisgett National Grid |
| Timetable | 1 | daniel.hisgett@nationalgrid.com |
| Modification timetable: | | Transporter: |
| Pre-Modification Discussed | 06 January 2022 | National Grid |
| New Modification to be considered by Panel | 20 January 2022 | © |
| First Workgroup Meeting | 03 February 2022 | box.gsoconsultatio |
| Workgroup Report to be presented to Panel | 17 February 2022 | ns@natinoalgrid.co |
| Draft Modification Report issued for consultation | 18 February 2022 | <u>m</u> |
| Consultation Close-out for representations | 10 March 2022 | 07971500855 |
| Final Modification Report available for Panel (at short notice) | 15 March 2022 | Systems Provider: |
| Modification Panel decision | 17 March 2022 | Xoserve |
| | | UKLink@xoserve.c |

<u>om</u>

1 Summary

What

The pan European Capacity Allocation Mechanisms Network Code (CAM NC), Article 19 Paragraph 6, allows for unbundled capacity at interconnectors to be traded on secondary markets. Uniform Network Code (UNC) Modification 0755S - Enhancement of Exit Capacity Assignments was implemented with the intent to enable unbundled capacity to be assigned at Exit Points.

Point 6 in the solution states "This functionality will be available at all Exit Points including DN Offtakes, Storage and Interconnectors, however any bundled Capacity would be excluded from this arrangement."

However, In between these two codes, the European Interconnection Document (EID) currently prevents Assignment of Exit Capacity from taking place at Interconnectors. The intent of this Modification is to remove that barrier.

This Modification also proposes to make a minor change to the Legal Text to clarify the charges payable at an Interconnection point.

Why

National Grid believes that this change brings the UNC more closely in line with CAM NC and therefore improves compliance and enables a Modification which has already been approved for implementation.

How

This can be achieved a change to clause 1.8.1 (e) in the EID and by the removal of the text "(which shall, for the avoidance of doubt be at the published Exit Transmission Services rate applicable for each Day during the Assignment Period)" from TDP Section B Paragraph 6.3.3 (c).

2 Governance

Authority Direction

Panel determined that Modification 0798 is likely to have a material effect given the changes to Legal Text reviewed by Panel Members which were felt to be significant and could change the intent of the original Modification and therefore potentially impacts UNC governance.

Modification 0798 will therefore follow Authority Direction procedures.

Requested Next Steps

This Modification should:

- be considered a material change and not subject to Self-Governance.
- proceed to Consultation.

3 Why Change?

National Grid believes this change is required to enable full implementation of UNC Modification 0755S and also brings us more closely in line with CAM NC. UNC Modification 0755S can still be implemented without

Joint Office of Gas Transporters

this Modification, but the functionality will not be made available at Interconnectors until the EID is amended to allow Assignment at Interconnectors.

4 Code Specific Matters

Reference Documents

Transportation Principle Document: Section B

https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2020-10/4%20TPD%20Section%20B%20-%20System%20Use%20%26%20Capacity 0.pdf

UNC Modification Proposal 0755S

https://www.gasgovernance.co.uk/0755

EU Capacity Allocation Mechanism Code

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32017R0459

European Interconnection Document

 $\frac{https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2021-03/4\%20EID\%20Section\%20B\%20-05/20Capacity.pdf}{20Capacity.pdf}$

5 Solution

This Modification aligns the updated UNC to the CAM NC by removing the barrier placed in the EID. The amendment to clause 1.8.1 (e) in the EID, along with a small change to the UNC to provide additional clarity to the text, do not change the solution implemented as part of UNC Modification 0755S.

The Legal Text is the solution in this instance.

6 Impacts & Other Considerations

Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No, it does not.

Consumer Impacts

There are no impacts beyond those already assessed and approved under UNC Modification 0755S.

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

This Modification has no impact on consumers save for enabling UNC Modification 0755S.

| Impact of the change on Consumer Benefit Areas: | | |
|---|-------------------|--|
| Area | Identified impact | |
| Improved safety and reliability | None | |

Joint Office of Gas Transporters

| Lower bills than would otherwise be the case | None |
|--|------|
| Reduced environmental damage | None |
| Improved quality of service | None |
| Benefits for society as a whole | None |

Cross-Code Impacts

There are no Cross-Code Impacts.

EU Code Impacts

This Modification will bring the GB market more closely in-line with the CAM NC.

Central Systems Impacts

There are no Central Systems Impacts.

Panel Questions

The Workgroup must provide an assessment against each of the Panel Questions

1. Assess if the removal of legal text (avoidance of doubt statement) is appropriate and if so why, and what are the potential consequences?

Insert text here

2. Does this impact the governance of the Modification?

Insert text here

Workgroup Impact Assessment

Insert text here.

7 Relevant Objectives

| Impact of the Modification on the Transporters' Relevant Objectives: | | |
|--|--|-------------------|
| Relevant Object | tive | Identified impact |
| a) Efficient an | d economic operation of the pipe-line system. | None |
| (i) the con | d, efficient and economic operation of abined pipe-line system, and/ or e-line system of one or more other relevant gas transporters. | None |
| c) Efficient dis | charge of the licensee's obligations. | None |
| (i) betwee (ii) betwee (iii) betwee | reffective competition: n relevant shippers; n relevant suppliers; and/or n DN operators (who have entered into transportation ements with other relevant gas transporters) and relevant shippers. | None |
| that the do | f reasonable economic incentives for relevant suppliers to secure mestic customer supply security standards are satisfied as e availability of gas to their domestic customers. | None |
| f) Promotion | of efficiency in the implementation and administration of the Code. | None |
| | with the Regulation and any relevant legally binding decisions of an Commission and/or the Agency for the Co-operation of Energy | Positive |

This Modification allows unbundled capacity to be assigned, as allowed by Article 19 paragraph 6 of CAM NC. While UNC Modification 0755S updated Section B of the UNC, clause 1.8.1 (e) in the EID prevents assignment of Exit Capacity at Interconnectors, this Modification brings the GB Market more closely into alignment with the EU.

8 Implementation

Workgroup to assess and provide.

[Modification 0798 is required to enable full implementation of UNC Modification 0755S - Amendment to the Requirement to Conduct the Transporting Britain's Energy Consultation. UNC Modification 0755S can still be implemented without this Modification, but the functionality will not be made available at Interconnectors until the EID is amended to allow Assignment at Interconnectors.

Implementation therefore should be as soon as possible following Authority direction.]

9 Legal Text

Text Commentary

The proposal would amend clause 1.8.1 (e) from Section B of the EID and adjust clauses 6.3.3 (c) of the UNC.

Text

European Interconnector Document (EID)

1.8 Provisions of Transportation Principal Document which do not apply

- 1.8.1 The following provisions of the Transportation Principal Document do not apply in relation to Interconnection Point Capacity:
 - (a) provisions as to the basis on which Users are invited to apply for, may apply for, and are allocated, NTS Entry Capacity or NTS Exit (Flat) Capacity;
 - (b) provisions as to the basis on which Users are invited to offer and may offer for surrender NTS Entry Capacity for a calendar month, and on which such offers are accepted;
 - (c) provisions as to the publication of information relating to invitations as referred to in paragraphs (a) and (b);
 - (d) provisions relating to Code Contingencies affecting the communications for the purposes of the matters referred to in paragraphs (a) and (b);
 - (e) provisions as to the assignment (by System Capacity Assignment) of Registered
 NTS Exit (Flat) Capacity to the extent that those provisions apply to Bundled Firm Interconnection Point Capacity;
 - (f) provisions defining terms which are used only in provisions within paragraphs (a), (b), (c), (d) and (e).

Uniform Network Code (UNC)

- 6.3.3 With effect from the first Day of the Assignment Period (and in respect of each subsequent Day in that Assignment Period):
 - (a) the Assignor User shall cease to be liable for Capacity Charges in respect of the Assigned System Capacity;
 - (b) the Assignee User shall be liable for Capacity Charges in respect of the Assigned System Capacity;
 - (c) the Capacity Charges payable by the Assignee User shall be the same Capacity Charges that would have otherwise been payable by the Assignor User for the Assigned System Capacity but for the assignment (which shall, for the avoidance of doubt be at the published Exit Transmission Services rate applicable for each Day during the Assignment Period)

10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that this Modification should proceed to consultation.