








UNC Final Modification Report	At what stage is this document in the process?
<h1>UNC 0787S:</h1> <p>Introducing amendments to the interconnection agreement with Interconnector Limited to reflect latest operational standards and practices</p>	<div style="display: flex; flex-direction: column; gap: 10px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 01 Modification </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 02 Workgroup Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 03 Draft Modification Report </div> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; display: flex; align-items: center; gap: 10px;"> 04 Final Modification Report </div> </div>
<p>Purpose of Modification:</p> <p>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.</p>	
<p>Next Steps:</p> <p>The Panel determined that this Self-Governance Modification be implemented.</p>	
<p>Impacted Parties:</p> <p>Low: Interconnector Ltd.; National Grid; Shippers</p>	
<p>Impacted Codes: None.</p>	

Contents		?	Any questions?
1	Summary	3	Contact: Joint Office of Gas Transporters
2	Governance	3	 enquiries@gasgovernance.co.uk
3	Why Change?	3	 0121 288 2107
4	Code Specific Matters	4	Proposer: Malcolm Montgomery
5	Solution	4	 Malcolm.montgomery@nationalgrid.com
6	Impacts & Other Considerations	5	 07970 114460
7	Relevant Objectives	7	Transporter: National Grid Gas
8	Implementation	7	 Malcolm.montgomery@nationalgrid.com
9	Legal Text	7	 07970 114460
10	Consultation	8	Systems Provider: Xoserve
11	Panel Discussions	8	 UKLink@xoserve.com
12	Recommendations	9	
13	Appended Representations	9	

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	16 December 2021
Consultation Close-out for representations	21 January 2022
Final Modification Report available for Panel	24 January 2022
Modification Panel decision	17 February 2022

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.
- be implemented.

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.

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 "Curtailed Notice".	To better reflect current operational practices.
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 practice.	Drafting simplified significantly as a general update and to reflect actual operational practice.
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 (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: (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

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 Consultation

Panel invited representations from interested parties on 16 December 2021. No representations were received by the consultation close out date. However, at the January 2022 Panel it was agreed to accept late representations up to and including 21 January 2022.

One representation was received from National Grid NTS in Support of the Modification and has been appended to this report.

11 Panel Discussions

Discussion

The Panel Chair summarised that Modification 0787S is an enabling Modification which should allow National Grid to amend the interconnection agreement with Interconnector Limited (IL). This will allow the interconnection agreement to reflect latest standards and practices in gas quality and general operations

Panel Members noted that implementation was supported by the 1 representation received. Members were concerned that only 1 representation has been received and that this was from the proposer, however it was also noted that as this is an enabling Modification with no changes proposed to the UNC itself, and might be of limited interest to the wider industry.

Panel Members noted the changes proposed to the interconnection agreements relate to gas quality, flow rates, PRISMA and general communications between operators and can be characterised as bringing the agreements in line with the latest operational standards and practices and thereby simplifies current operations.

Consideration of the Relevant Objectives

Panel Members considered relevant objective *b) the coordinated, efficient and economic operation of (i) the combined pipeline system*, agreeing that implementation would have a positive impact because the proposed amendments to the interconnection agreements should allow National Grid to improve co-ordination with an adjacent operator, hence facilitating efficient operation of the NTS.

Determinations

Panel Members voted unanimously that Modification 0787S does not have an SCR impact.

Panel Members voted unanimously that no new issues were identified as part of consultation.

Panel Members voted unanimously that there were no cross Code impacts.

Panel Members voted unanimously that the Modification should continue as a Self-Governance Modification.

Panel Members voted unanimously (14 out of 14 votes) to implement Modification 0787S.

12 Recommendations

Panel Determination

Panel Members agreed that Modification 0787S be implemented.

13 Appended Representations

Representation - National Grid NTS

Representation - Draft Modification Report UNC 0787S

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

Responses invited by: **5pm on 18 January 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Malcolm Montgomery
Organisation:	National Grid NTS
Date of Representation:	18/01/2022
Support or oppose implementation?	Support
Relevant Objective:	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 National Grid NTS (NG) supports its implementation. This is an enabling modification that provides the governance for making changes to relevant provisions with the interconnection agreements between NG and Interconnector Ltd (INT). The changes relate to gas quality, flow rates, PRISMA and general communications between operators and can be characterised as bringing the agreement in line with the latest operational standards and practices. This ensures NG is operating the NTS in a coordinated and efficient manner and so furthers relevant objective b) coordinated, efficient and economic operation of (i) the combined pipeline system.

Self-Governance Statement: Please provide your views on the self-governance statement.

As proposed within the modification then self-governance is appropriate because we believe no material changes are being proposed that would warrant Authority consideration.

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

Implementation could take place as soon as both parties have completed their necessary governance processes. However, we also see merit in aligning the implementation date with the changes proposed under modification 0786S, as both modifications propose changes to the same agreement.

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

No costs identified. Efficient coordination between operators should see ongoing costs reduce in the long run.

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

As an enabling modification then no changes are proposed to the UNC itself. Change marked copies of the revised interconnector agreements have been provided, and we are satisfied they deliver the intent of 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.*

n/a

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

n/a