UNC Modification

At what stage is this document in the process?

UNC 0794S:

Obligation for DNOs to Continue Provision of Gas Composition Information to National Grid NTS 01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification

Purpose of Modification:

This Modification would formalise in the UNC the existing provision of daily information from the Distribution Network Operators (DNOs) to National Grid NTS (National Grid) regarding gas composition at specified points on their respective networks.

Next Steps:

The Proposer recommends that this Modification should be:

- subject to Self-Governance
- assessed by a Workgroup

This Modification will be presented by the Proposer to the Panel on 16 December 2021. The Panel will consider the Proposer's recommendation and determine the appropriate route.

Impacted Parties:

High: None

Low: Gas Distribution Network Operators, National Grid NTS

None: Shipper Users

Impacted Codes:

None

Joint Office of Gas Transporters

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Timetable		07825 592518
Modification timetable:		Transporter:
New Modification to be considered by Panel	16 December 2022	National Grid NTS
First Workgroup Meeting	07 January 2022	
Workgroup Report to be presented to Panel	17 February 2022	phil.lucas@nationa
Draft Modification Report issued for consultation	18 February 2022	grid.com
Consultation Close-out for representations	10 March 2022	07825 592518
Final Modification Report available for Panel	12 March 2022	Systems Provider:
Modification Panel decision	17 March 2022	Xoserve
		UKLink@xoserve.c

1 Summary

What

National Grid utilises gas quality data currently provided by DNOs in order to calculate emissions of certain gasses from its compressor fleet pursuant to a number of UK regulations. In absence of any change to the Unform Network Code (UNC), at the conclusion of National Grid's current interim service for determination of charging area Calorific Values (CVs) (the 'interim service') there will be no contractual obligations on the DNOs to provide the necessary gas quality information to National Grid to enable determination of quantities of such from its compressor fleet.

Why

The relevant gas quality information was previously provided to National Grid by DNOs as part of the dataset (currently comprised in the 'ZO' file) used by National Grid to determine charging area CVs on behalf of DNOs under Section F of the Offtake Arrangements Document (OAD). Following the discontinuation of this service under the OAD, this data has continued to be provided by DNOs to enable National Grid to enable it to provide an 'interim service' under a separate contractual arrangement outside the UNC. Following the end of this interim service (expected to be the end of March 2022) DNOs will prospectively determine the charging area CVs via a new service provider (the 'enduring service').

How

It is proposed that a new obligation is included in the OAD for DNOs to formalise the existing provision of daily information to National Grid regarding gas quality at specified points on their respective networks. This obligation is required to be in place in time for commencement of the enduring service.

It is proposed that a DNO is able to recover from National Grid reasonable costs of providing this information.

2 Governance

Justification for Self-Governance

Application of Self-Governance procedures is sought because the change proposed is unlikely to have a material effect on the aspects described in the Self-Governance criteria. Specifically, the proposed obligation seeks to formalise the existing provision of data which is already collected by DNOs and provided to National Grid in order to facilitate industry arrangements to date. To this extent, the Proposal is not expected to place an additional burden on the relevant parties.

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?

National Grid utilises gas quality data currently provided by DNOs in order to calculate quantities of:

energy used by;

- gas vented from;
- Nitrogen Oxides (NOx) emitted by; and
- carbon dioxide (CO₂) emitted by

its compressor fleet and reported pursuant to the Environmental Permitting and Pollution Prevention and Control Regulations, the UK Emissions Trading Scheme (UKETS) and regulatory reporting to the Authority. As gas quality is not measured at all National Grid compressors, the data is provided by DNOs is from a DNO Offtake which is geographically close to the relevant compressor, this being a reliable indicator of gas composition at the relevant compressor site.

The relevant gas quality information was previously provided to National Grid by DNOs as part of the dataset used by National Grid to determine charging area CVs on behalf of DNOs under Section F of the OAD. Following the discontinuation of this service under the OAD, this data has continued to be provided by DNOs to enable National Grid to provide an interim service under a separate contractual arrangement. Following the end of this interim service (expected to be between January and April 2022) DNOs will prospectively determine the charging area CVs via a new service provider (the 'enduring service').

In absence of any change to the UNC, following the conclusion of National Grid's current provision of an interim service for determination of charging area CVs (the 'interim service') there will be no contractual obligations on the DNOs to provide the necessary gas composition information to National Grid to enable determination of the relevant quantities in respect of its compressor fleet. Therefore, the proposed obligation is required to be in place in time for commencement of the enduring service.

For the avoidance of doubt, this Proposal concerns inter-Transporter communications and does not propose any change to, nor have any impact upon, communications between Transporters and Shipper Users.

4 Code Specific Matters

Reference Documents

The Environmental Permitting (England and Wales) Regulations 2016

https://www.legislation.gov.uk/uksi/2016/1154/contents/made

The Pollution Prevention and Control (Scotland) Regulations 2012

https://www.legislation.gov.uk/ssi/2012/360/contents/made

UK Emissions Trading Scheme - The Greenhouse Gas Emissions Trading Scheme Order 2020

https://www.legislation.gov.uk/ukdsi/2020/9780348209761/contents

Knowledge/Skills

None

5 Solution

It is proposed that new provisions are included in the OAD requiring the relevant DNO to provide to National Grid the information detailed in the **Information Requirements** section at each of the Gas Composition Data Sites specified in the **Locations Table** (for the avoidance of doubt, including the indicated Backup locations) except where '(National Grid)' is stated.

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It is proposed that this information is provided for each day by 08:00 hours on the following day ('D+1') and that National Grid NTS will only be permitted to utilise the data for the purposes as set out in this Modification Proposal i.e. determination of the volume of emissions from its compressor fleet as required by the relevant legislation.

Information Requirements

The following information is required (in each case, the hourly values (i.e. 24 values), or the average of such (i.e. 1 value), for the relevant Gas Day):

- Methane mol(%)
- Ethane mol(%)
- Propane mol(%)
- i-butane mol(%)
- n-butane mol(%)
- i-pentane mol(%)
- n-pentane mol(%)
- neo-pentane mol(%)
- C6+ mol(%)
- Carbon dioxide mol(%)
- Nitrogen mol(%)

Locations Table

National Grid Compressor Site	Gas Composition Data Site – Primary	Gas Composition Data Site - Backup	Relevant DN
Aberdeen	Aberdeen	Balgray	Scotland Gas Networks
Alrewas	Alrewas C	Austry	Cadent
Avonbridge	Armadale	Drum	Scotland Gas Networks
Aylesbury	lpsden	Hardwick	Southern Gas Networks
Bishop Auckland	Bishop Auckland	Elton	Northern Gas Networks
Cambridge	Great Wilbraham	Royston	Cadent
Carnforth and Nether Kellet	Lupton	Wetheral	Cadent (Primary) Northern Gas Networks (Backup)
	Yelverton	Roudham Heath	Cadent

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Churchover	Rugby	Market Harborough	Cadent
Diss	Yelverton	Roudham Heath	Cadent
Felindre	Ross	Fiddington	Cadent (Primary) Wales & West Utilities (Backup)
Hatton	(National Grid)	Gosberton	Cadent (Backup)
Huntingdon	Peterborough Eye	Hardwick	Cadent (Primary) Southern Gas Networks (Backup)
Kings Lynn	West Winch	(National Grid)	Cadent (Primary)
Kirriemuir	Balgray	Aberdeen	Scotland Gas Networks
Lockerley	lpsden	Winkfield	Southern Gas Networks
Peterborough	Peterborough Eye	Caldecott	Cadent
St Fergus	(National Grid)	Aberdeen	Scotland Gas Networks (Backup)
Wisbech	Gosberton	West Winch	Cadent
Wooler	Saltwick	Armadale	Northern Gas Networks (Primary) Scotland Gas Networks (Backup)
Wormington	Fiddington	Evesham	Wales & West Utilities

Additional Requirements

It is proposed that the relevant DNO is required to notify National Grid as soon as practicable where the following occurs:

- changes are made to the site/system configuration (for example Site number, Analyser serial number or type);
- planned equipment outages; or
- "loss of records" occurrences.

<u>Costs</u>

It is proposed that a DNO is able to recover from National Grid the reasonable and demonstrable costs of:

- the re-establishment of the information provision service (if applicable); and
- the ongoing provision of the service to communicate the information to National Grid.

Such costs to be recovered in accordance with provisions of OAD Section L.

6 Impacts & Other Considerations

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

No, this Modification would not impact any current SCR.

Consumer Impacts

None. This proposal relates to gas composition information exchanged between Gas Transporters at DNO Offtakes which are proximate to points of National Grid gas compression facilities and on this basis is not expected to impact consumers.

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

As identified above, there is not expected to be any impact on consumers.

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

None. This Modification is based on current arrangements between National Grid and DNOs and would have no impact on relationships between these parties and other Codes.

EU Code Impacts

None.

Central Systems Impacts

No impacts on Central Systems have been identified.

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 (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c)	Efficient discharge of the licensee's obligations.	Positive
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

The inclusion in the UNC OAD of transparent and clear obligations which enable accurate and timely calculation of emissions data from National Grid compressors supports the efficient operation of the pipeline system.

Implementation would also enable the continuation of the efficient discharge of National Grid's obligations set out in Special Condition 5.6 Parts D and E relating to the calculation and reporting of greenhouse gas emissions volumes being a component of the System Operator external incentives.

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

See separate document.

Text

See separate document.

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.