

Representation - Draft Modification Report UNC 0794S

Obligation for DNOs to Continue Provision of Gas Composition Information to National Grid NTS

Responses invited by: **5pm on 11 March 2022**

To: enquiries@gasgovernance.co.uk

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

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|---|----------------------------|
| Representative: | Phil Lucas |
| Organisation: | National Grid NTS |
| Date of Representation: | 7 th March 2022 |
| Support or oppose implementation? | Support |
| Relevant Objective: | a) Positive c) Positive |
| Relevant Charging Methodology Objective: | Not Applicable |

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

As the proposer, National Grid NTS ('National Grid') supports the implementation of this Modification Proposal.

Modification of the UNC to formalise the continued daily provision of gas composition information by Distribution Network Operators to National Grid will enable National Grid to continue to meet its statutory obligations regarding the reporting of energy consumed by, and emissions from, its compressor fleet.

As identified in the Proposal, we believe that enabling the continued timely calculation of such information would support the efficient operation of the pipeline system (relevant objective a) and enabling the continued reporting of greenhouse gas emissions (as required under Special Condition 5.6, Parts D and E of our licence) implementation would also better facilitate relevant objective c).

Self-Governance Statement:

National Grid continues to believe that application of Self Governance procedures is appropriate in this case as the change proposed (if implemented) is unlikely to have a material effect on the aspects described in the Self-Governance criteria. The Proposal

merely seeks to formalise in UNC an existing data transaction between National Grid and Distribution Network Operators.

Implementation:

As the proposed new obligation reflects an existing information flow which is required on an enduring basis, no specific lead time is required for implementation. On this basis, as Self-Governance procedures apply, implementation could be sixteen business days in the event of a Modification Panel decision to implement, subject to no Appeal being raised.

Impacts and Costs:

National Grid would not incur any costs as a consequence of implementation.

Legal Text:

National Grid is satisfied that the legal text it has provided will deliver the intent of the solution.

National Grid's opinion remains that the UNC, and more specifically the Offtake Arrangement Document (OAD), is an appropriate vehicle to host this obligation given this Document's stated overall purpose expressed in OAD Section A1.1.1 (i.e. setting out "*rights and obligations as between the Transporters in relation to the connections between, and the planning, maintenance and operation of, their respective Systems*").

Are there any errors or omissions in this Modification Report that you think should be taken into account?

National Grid has not identified any such errors or omissions.

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

Not applicable.