

Representation - Draft Modification Report UNC 0771S

Removal of the absolute requirement to include a Remotely Operable Valve (ROV) Installation for all new NTS Entry connections

Responses invited by: 5pm on 13 May 2022

To: enquiries@gasgovernance.co.uk

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

Representative:	David Mitchell
Organisation:	Scotland Gas Networks Ltd & Southern Gas Network Ltd
Date of Representation:	13 th May 2022
Support or oppose implementation?	Oppose
Relevant Objective:	d) Negative
Relevant Charging Methodology Objective:	b) Negative c) Negative

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

SGN does not support the implementation of this modification due to our concerns of the potential of non-compliant gas entering the LDZ via National Grid Gas network offtake points system entry points where There is a risk of the GDN receiving non-compliant GS(M)R gas into the LDZ as a result of a Remotely Operated Valve not being an absolute obligation for new entry points. In the future the NTS may have a large volume entry point which majorly influences the flow of gas into the LDZ due to the push to introduce green gas which may further increase this risk. We believe that the implementation of this Modification may result in an increased risk of non-compliant gas entering the GDNs network and a resulting requirement to install additional monitoring equipment if we consider there's a heightened risk.

We acknowledge that currently there is not an obligation in the UNC on the GDN's to install an ROV at a LDZ system entry point, however SGN's policy and procedure requires the installation due to a recognised risk of non-compliant GS(M)R gas entering into the network without this additional risk mitigation.

We are mindful that the HSE have stated that this modification is a non-material change to the safety case however no additional information has been provided as to the background to this decision. Therefore, SGN is not clear whether there is an increased risk and whether this has been deemed to be acceptable or whether there is no additional risk? We note

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NGG's reliance on a manual valve should there be a requirement to curtail gas entry and would question whether this type of valve would provide a timely solution to prevent non-compliant GS(M)R gas from entering the network or networks.

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

This modification should not be Self-Governance as per the self-governance rules on the basis that it has the potential to increase investment in network assets.

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

We have no preference regarding the lead-time for this Modification if it were implemented, however we would highlight National Grid Gas should provide prior notification to the GDNs should there be a new entry connection connecting to the NTS without ROV protection.

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

SGN may decide to implement additional gas quality monitoring equipment should there be deemed to be an additional risk of non-compliant gas entering the SGN network.

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

No comments.

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.*

None identified.

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

None identified.