UNC Final Modification Report

UNC 0837FT:

Updating all UNC references of "National Grid" to "National Gas Transmission" to reflect the sale of National Grid Gas plc. At what stage is this document in the process?



Purpose of Modification:

National Grid finalised the majority sale of its Gas Transmission business on 31 January 2023. The legal entity that carries on the gas transmission business and holds the gas transporter licence remains the same; it simply changed its name to National Gas Transmission following the sale. This housekeeping Modification proposes to update all references of National Grid, National Grid NTS, National Grid Gas and National Grid Company plc to National Gas Transmission to align with the licence holder.

Next Steps:

The Panel determined that this Fast Track Self-Governance Modification should be made.

Impacted Parties:

All NTS users

Impacted Codes:

All sections of the UNC

Joint Office of Gas Transporters

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Modification timetable:		Joshua Bates
Pre-Modification Discussed	26 January and	Ø
	02 February 2023	Joshua.bates@nati
Date Modification Raised	08 February 2023	onalgrid.com
New Modification to be considered by Panel	16 February 2023	V telephone
Modification Panel decision	16 February 2023	Systems Provider:
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1 Summary

What

This housekeeping Modification proposes to update all references of National Grid, National Grid NTS, National Grid Gas and National Grid Company plc to National Gas Transmission, to align with the licence holder.

Why

References to National Grid as the National Transmission System owner and Licence holder are now out of date following the majority sale of National Grid Gas on 31 January 2023. National Grid no longer holds a Gas Transporter's licence. The legal entity that holds the licence is now called National Gas Transmission.

How

Defined terms will be updated in General Terms, Section B. All instances of National Grid, National Grid NTS, National Grid Gas and National Grid Company plc will then be amended to National Gas Transmission, using find and replace. Incorrect website links referencing the National Grid website will be updated. Updates will be clearly marked using track changes.

2 Governance

Justification for Fast Track Self-Governance

This Modification meets the Fast-Track Self-governance criteria. It is a housekeeping Modification as it seeks only to update the Gas Transporters licence holder's company name and out of date website links.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be subject to Fast Track Self Governance

3 Why Change?

On 31 January 2023 National Grid completed the sale of its Gas Transmission business. The legal entity that holds the gas transporter licence remains unchanged, however it has changed its name to National Gas Transmission. On 06 February 2023 the Gas Transporter licence was updated to reflect this.

It is prudent to amend UNC to reflect the change in company name as soon as possible to align with the licence.

Legal text provided by Transporters for Modifications that are currently 'in-flight' that would be impacted by this proposal have been reviewed. These proposals, and the suggested remedial actions to the legal text, are listed in Appendix 1 of this Proposal.

4 Code Specific Matters

Reference Documents

UNC (General, Transportation Principal Document, Offtake Arrangements Document, European Interconnection Document, and Independent Gas Transporter Arrangements Document)): <u>https://www.gasgovernance.co.uk/UNC</u>

UNC, General Terms, Section B:

https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2022-11/22%20GTB%20-%20General.pdf

5 Solution

Update Defined Terms

Defined terms for National Grid and National Grid NTS are contained in General Terms, Section B, paragraph 2.1.1. This will be updated to reflect the new business name as detailed below:

Current wording:

2.1.1 For the purposes of the Code:

(a) "National Grid NTS" means National Grid as licensee under the Transporter's Licence authorising the conveyance of gas through the NTS;

(b) "DN Operator" or "DNO" means a person which is the owner or operator of one or more LDZ(s) and licensee under a Transporter's Licence authorising the conveyance of gas through such LDZ(s);

- (c) "Transporter" means National Grid NTS or a DN Operator; and
- (d) "National Grid" means National Grid Gas plc.

Revised wording:

2.1.1 For the purposes of the Code:

(a) "National Gas Transmission" means National Gas Transmission plc with company number 2006000 as licensee under the Transporter's Licence authorising the conveyance of gas through the NTS. Any reference to "National Grid", "National Grid NTS", "National Grid Gas" or "National Grid Company" shall be deemed to refer to National Gas Transmission, effective from 1st February 2023;

(b) "DN Operator" or "DNO" means a person which is the owner or operator of one or more LDZ(s) and licensee under a Transporter's Licence authorising the conveyance of gas through such LDZ(s); and

(c) "Transporter" means National Gas Transmission or a DN Operator.

Find and Replace

A "find and replace" exercise has been undertaken to replace all references of National Grid, National Grid NTS, National Grid Gas and National Grid Company with National Gas Transmission. All updates are clearly marked in the legal text provided. A summary of changes has been provided in Appendix 2 of this Proposal.

Incorrect website links referencing the National Grid website have been updated.

• Legal text is provided alongside this Modification.

6 Impacts & Other Considerations

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

None

Consumer Impacts

None, the Modification is limited to housekeeping changes which have no impact on Consumers.

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

N/A

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

EU Code Impacts

None

Central Systems Impacts

None 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.	None
b) Coordinated, efficient and economic operation of	None
(i) the combined pipe-line system, and/ or	

Joint Office of Gas Transporters

	(ii) the pipe-line system of one or more other relevant gas transporters.	
c)	Efficient discharge of the licensee's obligations.	None
d)	Securing of effective competition:	None
	(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.	
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.	Positive
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

As this proposal is updating references to reflect a change in company name the broader Standard Relevant Objective f) (Promotion of efficiency in the implementation and administration of the Code) is better facilitated by ensuring that the UNC is reflecting the licence.

8 Implementation

As Fast Track Self-Governance procedures are proposed, implementation could be sixteen business days after a unanimous vote in favour of implementation by the Modification Panel, subject to no Objection being raised.

9 Legal Text

Text Commentary

UNC General Terms, Section B, paragraph 2.1.1. shall be amended as outlined below to ensure the change in company name is defined correctly.

The UNC Defined Terms shall be amended to remove the definition of National Grid. All other references to National Grid, National Grid NTS and National Grid Gas shall be replaced with National Gas Transmission.

UNC, TPD, Section V, Annex V-2 and UNC, TPD, Section Y, Appendix A shall be amended as outlined below to ensure correct website references.

Text

UNC General Terms, Section B

2.1.1 For the purposes of the Code:

(a) <u>"National Grid NTS"</u> "National Gas Transmission" means <u>National Grid</u> National Gas Transmission plc with company number 2006000 as licensee under the Transporter's Licence authorising the conveyance of gas through the NTS. Any reference to "National Grid", "National Grid NTS", "National Grid Gas" or "National Grid Company" shall be deemed to refer to National Gas Transmission, effective from 1st February 2023;

(b) "DN Operator" or "DNO" means a person which is the owner or operator of one or more LDZ(s) and licensee under a Transporter's Licence authorising the conveyance of gas through such LDZ(s);and

(c) "Transporter" means National Grid NTS National Gas Transmission or a DN Operator; and.

(d) "National Grid" means National Grid Gas plc.

UNC, General, Defined Terms

National Grid GT B2.1.1(d)

UNC, TPD, Section V, Annex V-2 SO Commodity Charge Information

www.nationalgrid.com/uk/gas https://www.nationalgas.com/

UNC, TPD, Section Y, Appendix A – Definitions

http://www2.nationalgrid.com/UK/Industry-information/System-charges/Gastransmission/Charging-Statements/ https://www.nationalgas.com/charging/transmission-system-charges

In addition to the above, a copy of UNC showing all other instances where National Gas Transmission shall replace National Grid, National Grid NTS, National Gas or National Grid Company has been provided separately.

10 Panel Discussions

Discussion

The Panel Chair summarised that Modification 0837 would update all references of National Grid, National Grid NTS, National Grid Gas and National Grid Company plc to National Gas Transmission following National Grid finalising the majority sale of its Gas Transmission business on 31 January 2023.

Panel Members agreed with the Proposer that this Modification meets the Fast-Track Self-Governance criteria as it is a housekeeping Modification to reflect the sale of National Grid Gas plc and update all UNC references of National Grid, National Grid NTS, National Grid Gas and National Grid Company plc to National Gas Transmission, the legal entity that holds the licence.

Panel Members noted that the UK Link Manual may need to be updated in light of this Modification 0837FT.

Panel Members noted that there may be a need for IGT-UNC and REC to be updated in light of this Modification 0837FT.

Consideration of the Relevant Objectives

Panel Members considered **Relevant Objective f)** *Promotion of efficiency in the implementation and administration of the Code*, agreeing that implementation would have a positive impact because the Modification ensures that the UNC is reflective of the legal entity which holds the licence.

Panel Members considered whether the Transporters Relevant Charging Methodology and/or the Relevant Charging Methodology Objectives should be considered. It was agreed that as there would be no change to any charges or charging methodologies as a result of the name change these did not need to be considered.

Determinations

Panel Members voted unanimously that the Modification has Cross code impacts.

Panel Members voted unanimously that the Modification meets the Self Governance criteria.

Panel Members voted unanimously that the Modification meets the Fast Track criteria.

Panel Members voted unanimously to implement Modification 0837FT.

11 Recommendations

Panel Determination

Panel Members agreed that Modification 0837FT should be implemented.

12 Appendices

Appendix 1

The legal text for following 'in-flight' Modification Proposals (as of 1st February 2023) would be impacted by the implementation of this Proposal.

Table 1 – *Proposals which have been subject to a determination under Modification Rules paragraph 9.3.3(a) or 9.3.10(a).*

Mod Number	Title	Legal Text Provider	Status	Relevant Section/s	Suggested Revisions
<u>0761</u>	Arrangements for Interconnectors with additional Storage capability	National Gas Transmission	With Ofgem awaiting a decision	TPD, R paragraph 4.1.1(c) and (d), 4.3.1, 4.3.2 and 4.3.3	Amend 6 references of "National Grid NTS" and 1 reference of "National Grid" to "National Gas Transmission"
<u>0710S</u>	CDSP provision of Class 1 read service	Wales & West Utilities Ltd	Awaiting Implementation (1 st April 2023)	TPD, M paragraph 3.4.1(a), (b) and (c)	Amend 7 references of "National Grid" to "National Gas Transmission"

It is anticipated that in the event of implementation of any of the Proposals listed in the above table, a further Fast Track Modification Proposal will be required, post implementation, in order to correct the identified wording.

Table 2 – Proposals yet to be subject to a determination under Modification Rules paragraph 9.3.3(a)
or 9.3.10(a).

Mod Number	Title	Legal Text Provider	Status	Relevant Section/s	Suggested Revisions
<u>08325</u>	Introducing additional flexibility to change the NTS large price step for Ascending Clock Auctions at IPs	National Gas Transmission	At consultation	TPD, Y paragraph 2.9.2 (a) and (b)	Amend 3 references of "National Grid NTS" to "National Gas Transmission"
0813	Revision of Virtual Last Resort User and Contingent Procurement of Supplier Demand Event Triggers	National Gas Transmission	Live (panel decision 16/02/2023)	TPD, D paragraph 10.1.1 (a), TPD, G 4.8.2 (a), 4.8.9, 4.8.11 (a), 4.8.14	Amend 10 references of "National Grid NTS" to "National Gas Transmission"

It is suggested that the relevant Transporter provides a revised version of the legal text for the specified Proposal at the earliest opportunity in order to correct the identified wording.

Document	Section	National Grid	National Grid NTS	National Grid Gas/ National Grid Gas plc	National Grid Company	Count
General	UNC Introduction	1	0	0	0	1
General	Defined Terms Listing	7	4	0	0	11
General	TDI - General	3	0	0	0	3
General	TDIIA - General	17	0	0	0	17
General	TDIIB - New Transporter	46	0	0	0	46
General	TDIIC - Transitional Rules	35	236	0	0	271
General	TDIID - Flexibility Bidding	1	66	0	0	67
General	TDIIE - Re-allocation of NTS Entry Capacity at	0	22	0	0	22
	Bacton ASEP	<u>^</u>	<u>^</u>	2	<u> </u>	-
General	TDIIF - Nexus Implementation	0	0	0	0	0
General	TDIIG - Transitional Invoicing	0	13	0	0	13
General	TDIIH - CSS Implementation	0	0	0	0	0
General	TDIII - Offtake Arrangements Document	19	0	0	0	19
General	TDIV - Modification Rules	3	0	0	0	3
General	TDV - European Interconnection Document	8	12	0	0	20
General	TDVI - COVID 19 - Temporary Measures	0	3	4	0	7
General	Modification Rules	0	4	0	0	4
General	GTA - Dispute Resolution	0	0	0	0	0
General	GTB - General	6	6	1	0	13
			15	0	0	
General	GTC - Interpretation	3	-			18
General	GTD - CDSP and UK Link	1	14	0	0	15
TPD	TPD Section A - System Classification	1	7	0	0	8
TPD	TPD Section B - System Use and Capacity	1	551	0	0	552
TPD	TPD Section C - Nominations	0	40	0	0	40
	TPD Section D - Operational Balancing and		170	^		470
TPD	Trading Arrangements	1	178	0	0	179
TPD	TPD Section E - Daily Quantities, Imbalances and Reconciliation	0	21	0	0	21
TPD	TPD Section F - System Clearing, Balancing Charges and Neutrality	0	75	0	0	75
	, ,	4	44	^		12
TPD	TPD Section G - Supply Points	1	11	0	0	12
TPD	TPD Section H - Demand Estimation and	0	5	0	0	5
	Demand Forecasting					_
TPD	TPD Section I - Entry Requirements	2	16	1	0	19
TPD	TPD Section J - Exit Requirements	0	37	0	1	38
TPD	TPD Section K - Operating Margins	1	148	1	0	150
	TPD Section L - Maintenance and Operational					
TPD	Planning	0	66	0	0	66
TPD	TPD Section M - Supply Point Metering	7		0	0	7
TPD	TPD Section N - Shrinkage	0	10	0	0	10
TPD		0	25	0	0	25
	TPD Section O - System Planning				-	
TPD	TPD Section Q - Emergencies	10	153	0	0	163
TPD	TPD Section R - Storage	1	25	0	0	26
TPD	TPD Section S - Invoicing and payments	0	8	0	0	8
TPD	TPD Section U - Not Used	0		0	0	0
TPD	TPD Section V - General	6	131	0	0	137
TPD	TPD section X - Emergency Balacncing Credit	0	183	0	0	183
	Management					
TPD	TPD Section Y - Charging Methodologies	69	83	2	0	154
OAD	OAD - Section A - Scope and Classification	0	0	0	0	0
OAD	OAD Section B - Connection Facilities	0	3	0	0	3
OAD	OAD Section C - Safetey and Emergency	0	20	0	0	20
OAD	OAD Section D - Measurements	0	1	0	0	1
OAD	OAD Section E - Telemetry etc	1	35	0	0	36
OAD	OAD Section F - Determination of Calorific	0	11	0	0	11
	Value					
OAD	OAD Section G - Maintenance	0	17	0	0	17
040	OAD Section H - NTS Lonf Term Demand		22	^		
OAD	Forecasting	0	32	0	0	32
OAD	OAD Section I - NTS Operational Flows	0	59	0	0	59
OAD	OAS Section J - LDZ/LDZ Offtakes - Planning and Operational Flows	0	0	0	0	0
OAD	OAD Section K - LDZ System Entry Points	5	36	0	0	41
OAD	OAD Section L - Cost Recovery Invoicing	0	0	0	0	0
		0	0	0	0	
OAD	OAD Section M - Information Flows					0
OAD	OAD Section N - General	2	18	1	0	21
EID	EID Section A - General	1	43	0	0	44
EID	EID Section B - Capacity	0	89	0	0	89
EID	EID Section C - Nomination	0	40	0	0	40
EID	EID Section D - Allocation	0	5	0	0	5
	EID Section E - Rules for the Release of	-				a -
EID	Incremental Capacity at IP	0	26	0	0	26
IGTAD	IGTAD Section A - Scope and Classification	0	0	0	0	0
IGTAD	IGTAD Section B - IGT Systems - Connections	0	0	0	0	0
IGTAD	and Operational Arrangements IGTAD Section C - IGTS Shrinkage	0	0	0	0	0
IGTAD	IGTAD Section D - IGT Code Rules and Data	0	2	0	0	2
	Exchange					
GTAD	IGTAD Section E - DM CSEP Supply Points IGTAD Section F - General	0	0 4	0	0	0
	Same Section 1 - General	v		· · ·	<u> </u>	
Total		259	2609	11	1	2880