UNC Modification

At what stage is this document in the process?

01

UNC 0834:

Inclusion of the "Process for the

02 Workgroup Report

Modification

Draft Modification 03 Report

Final Modification 04

Update and Retention of Shared Site Drawings" as a Subsidiary Document within the Offtake Arrangements Document

Purpose of Modification:

This Modification would add the "Process for the Update and Retention of Shared Site Drawings" to the list of Offtake Subsidiary Documents set out in Section N of the Offtake Arrangements Document. This will allow for uniformity of approach to the management of shared drawings and provide an appropriate governance framework around any future changes.

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 19 January 2023. The Panel will consider the Proposer's recommendation and determine the appropriate route.

Impacted Parties:

High:

Low: National Grid NTS and all GDNs

None: None Shipper Users

Impacted Codes:

N/A

Contents		Any questions?
1 Summary	3	Contact:
2 Why Change?	4	Joint Office of Gas Transporters
3 Code Specific Matters	5	Transporters
4 Solution	5	enquiries@gasgove
5 Impacts & Other Considerations	5	rnance.co.uk
6 Relevant Objectives	6	0121 288 2107
7 Implementation	7	Proposer:
8 Legal Text	7	Stephen Ruane National Grid NTS
9 Recommendations	9	National Grid N13
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Modification timetable:		Stephen Ruane
Pre-Modification Discussed	16 January 2023	National Grid NTS
(Offtake Arrangements Workgroup) Date Modification Raised	06 January 2023	
New Modification to be considered by Panel	19 January 2023	stephe.ruane@natio
First Workgroup Meeting	19 January 2023	nalgrid.com
(Offtake Arrangements Workgroup)	09 February 2023	07980602493
Workgroup Report to be presented to Panel	20 April 2023	Systems Provider:
Draft Modification Report issued for consultation	21 April 2023	Xoserve
Consultation Close-out for representations	15 May 2023	O
Final Modification Report available for Panel	16 May 2023	UKLink@xoserve.c
Modification Panel decision	18 May 2023	<u> </u>

1 Summary

What

The Offtake Arrangements Document (OAD) in the UNC sets out rights and obligations between the Transporters in relation to the connections between, and the planning, maintenance, and operation of, their respective Systems, and the implementation of certain provisions of the Transportation Principal Document (TPD). Section N1.2 of the OAD list a number of Offtake Subsidiary Documents and prescribes the mechanism by which those documents are modified.

Shared site drawings, which pictorially show the physical layout of Shared Site Facilities at Shared Sites, are currently managed by individual Transporters (outside of any prescribed UNC change governance) and have no formal change governance in place.

For the purpose of this Modification, any refence to "Shared Sites" and "Shared Site Facilities" refers to those sites and facilities which falls under the remit of the definitions as outlined in OAD Section N10.1.1.

Why

Following detailed consideration of all potential enhancements to the OAD under UNC Request Workgroup 0646R - Review of the Offtake Arrangements Document, it was identified that there was an opportunity to bring standardisation to the management of shared site drawings across all Transporters providing greater clarity and efficiency to the process.

This Modification seeks to establish consistent change governance arrangements for shared site drawings across all Operators. The proposed solution is to establish a new Subsidiary Document to the OAD which brings uniformity to the governance arrangements by which drawings are updated and shared for a range of different scenarios as well as documenting formally the standards of individual Operators that need to be complied with for instances where another party is making a change to one of their drawings.

How

It is proposed that a new Subsidiary Document "Process for the Update and Retention of Shared Site Drawings" is added to the list of Subsidiary Documents set out in OAD Section N1.2. The new Subsidiary Document (published alongside this proposal) was designed in collaboration with all Operators across a series of workshops.

Prospectively, the prevailing version of the new Subsidiary Document will be published on the Joint Office Website in the following location:

Offtake Arrangements Document | Joint Office of Gas Transporters (gasgovernance.co.uk)

A supporting amendment will be made to OAD section B 1.6.1.b (iii) and OAD Section N1.2.1 (h).

Justification for Self-Governance

This Modification should be subject to Self-Governance procedures on the basis that the necessary changes would have no material impact on the commercial activities of Shipper Users, Gas Transporters or Gas Consumers. The overarching objective of the Modification is to improve process efficiency for transporters only.

Requested Next Steps

This Modification should:

be assessed by a Workgroup.

2 Why Change?

The Offtake Arrangements Document (OAD) in the UNC sets out rights and obligations between the Transporters in relation to the connections between, and the planning, maintenance and operation of, their respective Systems, and the implementation of certain provisions of the Transportation Principal Document (TPD). Section N1.2 of the OAD list a number of Offtake Subsidiary Documents and prescribes the mechanism by which those documents are modified.

Shared site drawings, which pictorially show the physical layout of Shared Site Facilities at Shared Sites, are currently managed by individual Transporters (outside of any prescribed UNC change governance) and have no formal change governance in place.

For the purpose of this Modification, any refence to "Shared Sites" and "Shared Site Facilities" refers to those sites and facilities which falls under the remit of the definitions as outlined in OAD Section N10.1.1.

A review of the Offtake Arrangements Document was conducted under UNC Request Workgroup 0646R which identified an opportunity to enhance the operations of all transporters through bringing consistency to the management of shared site drawings across the industry¹.

Implementation of the proposed solution will result in numerous benefits including, but not limited to:

- Simplification and standardisation of the governance around such drawings for Site Owners who are accountable for the accuracy of the drawings under OAD Section B 1.6 (a);
- Ensuring consistency of drawings and data across impacted Operators;
- Ensuring there is a "Single Source of Truth" drawing;
- Enhanced process efficiency which will speed up project closures by accelerating the time to update shared site drawings; and
- Accelerating the time it takes to update contracts which are dependent on drawings.

Content of the Process for the Update and Retention of Shared Site Drawings

The new Subsidiary Document is the formalisation of certain key principles to ensure consistency in how shared site drawings are managed.

These principles are detailed extensively in the proposed subsidiary document but on high level covers off:

• An agreed scope as to what constitutes a minimum set of standard site owner drawings.

Joint Office of Gas Transporters

- Implementing the concept that the site owner has sole possession of editable versions of the drawings with site users having corresponding PDF versions.
- · A process for Site Users to update Site Owner drawings
- A process for Site Owner to update Site Owner drawings and notifying Site Users.
- Makes allowances for cost recovery if the site user requests a change is made to a drawing on their behalf by the site owner.

This solution is delivered as a consequence of multiple workshops which included participation from Subject Matter Experts from across all Operators where a consensus of opinion was met.

3 Code Specific Matters

Reference Documents

Offtake Arrangement Document (found here: https://www.gasgovernance.co.uk/OAD)

UNC Request Workgroup Report 0646R

Knowledge/Skills

A knowledge of individual Operator's drawings management processes.

4 Solution

It is proposed that a new Subsidiary Document "Process for the Update and Retention of Shared Site Drawings" is added to the list of Subsidiary Documents set out in OAD Section N1.2.

The new Subsidiary Document (published alongside this Proposal) was designed in collaboration with all Operators across a series of workshops.

Prospectively, the prevailing version of the new Subsidiary Document will be published on the Joint Office Website here: www.gasgovernance.co.uk/OADDocs.

It is proposed that a supporting amendment will be made to OAD section B 1.6.1.b (iii) and OAD section N 1.2.1 (h).

5 Impacts & Other Considerations

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

There is no impact on any Significant Code Review.

Consumer Impacts

There is no impact on consumers on the basis that the Modification is solely associated with Transporter to Transporter issues.

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

As this Modification proposal seeks to address Transporter to Transporter matters, the end consumer experience should not be impacted.

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 n/a	None	
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

No other industry codes are impacted.

EU Code Impacts

There is no impact on EU code.

Central Systems Impacts

There is no impact on any central system.

6 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	Positive	
(i) the combined pipe-line system, and/ or		
(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.	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 Modification furthers Relevant Objectives (a) and (b), as follows:

a) Efficient and economic operation of the pipe-line system

The proposed changes in this Modification are expected to introduce a robust and consistent approach to the management of change to Shared Site Drawings. Adoption of clear rules or how such changes are governed will enable Transporters to operate their Networks efficiently as change proposals will be more transparent and progress in accordance with a more defined timescale.

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

Due to the shared ownership nature of the sites concerned, a more defined governance process will enable Transporters to better co-ordinate any changes made at shared sites and therefore enhance the efficiency of operating the relevant assets

7 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.

In respect of the collaborative processes outlined in the document, as these were conceived by the respective Drawing Management Office's for each Operator, they have begun working to those principles already.

8 Legal Text

Text Commentary

Section B1.6.1(iii) in the Offtake Arrangements Document (OAD) has been amended to ensure the Site Owner at the Offtake prepares whole site diagrams (required for compliance with Legal Requirements, including Hazardous Area diagrams and COMAH diagrams) in accordance with the Process For The Update And Retention of Shared Site Drawings

Joint Office of Gas Transporters

A new subparagraph (h) has been inserted under OAD Section N1.2.1 to clearly identity the "Process For The Update And Retention of Shared Site Drawings" as an Offtake Subsidiary Document.

Text

OFFTAKE ARRANGEMENTS DOCUMENT

-Section ECTION B - CONNECTION FACILITIES

Amend paragraph 1.6 to read as follows:

1.6 ____Party's responsibilities

- 1.6.1 For the avoidance of doubt, at each Offtake Site, subject to the provisions of this Section B:
 - (a) __each Party shall be responsible for its own Connection Facilities, including the operation and maintenance of such Connection Facilities, compliance with any Legal Requirement in relation to such Connection Facilities, and the preparation of all such plans, diagrams, reports, and other documents as may be required by any Legal Requirement in relation to such Connection Facilities; and
 - (b) __subject to paragraph (a), each Party shall be responsible for the whole or any part of the Offtake Site for which it is Site Owner, including:
 - (i) the maintenance of land and buildings;
 - (ii) compliance with any Legal Requirement in relation to such land and buildings; and
 - (iii) in particular, the preparation of any whole site diagrams required for compliance with any such Legal Requirement, including Hazardous Area diagrams and COMAH diagrams, and in accordance with the Process for the Update and Retention of Shared Site Drawings document.

OAD Section ECTION N - GENERAL

Amend paragraph 1.2 to read as follows:

1.2 __Subsidiary Documents

- 1.2.1 In this Document, "Offtake Subsidiary Document" means each of the following documents:
 - (a) __the SCO Interface Procedures (referred to in Section C3);
 - (b) __the Offtake Communications Document (referred to in Section M);
 - (c) ___the Validation Procedures (referred to in Section D3);
 - (d) __the Emergency Procedures E2 (referred to in Section C2.3);
 - (e) __the document TD76 (referred to in Section H1.3.1);
 - (f) ___the Transmission System Operator to Distribution System Operator Agreement Guidelines (referred to in Section N9);
 - (g) __the OAD Template Agreements Document (referred to in Section A3.1.1 and paragraph 3.1.2);

Joint Office of Gas Transporters

- (h) the Process for the Update and Retention of Shared Site Drawings (referred to in Section B1.6.1);
- (i) any other document which may be specified or may be agreed by the Parties to be an Offtake Subsidiary Document.

9 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.