

Joint Office

Enquiries@gasgovernance.co.uk

10th August 2023

Dear Joint Office,

Re: 0808 - Reverse Compression

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN offers Comments in relation to this Modification Proposal.

Reason for Comments

Whilst NGN is supportive of changes that could aid in the move towards Net Zero, we feel that as currently drafted the modification and legal text are too wide in scope, and introduce new concepts and rules that are not specifically ringfenced for Reverse Compression. Whilst we appreciate this is likely not the intent of the proposer, we find that without this level of detail within the modification solution, and legal text, that this potentially opens the code to IGT entry for other purposes. Without additional level of controls around IGT entry, we feel that this would potentially be negative against Relevant Objective a) *Efficient and economic operation of the pipe-line system.*

Implementation:

As this is Authority Direction, it should be implemented on a date as directed by the Authority.

Impacts and Costs:

Due to the way that NGN manages capacity and pressure within its network, it is not currently felt that this is a feasible solution within our network. However, the impacts and costs will be assessed on a case-by-case basis.

Legal Text:

We note that within 3.5, whilst 'reverse compression' is defined, its use within the paragraph is not capitalised. Whilst we appreciate that there are other examples of this within code, we feel that capitalisation of the use in this instance would remove any potential ambiguity within the section.

Whilst the Legal text in relation to TPD A new paragraph 2.4 matches the Business Rule, we believe the Business Rules do not fully align to the intent of the modification in that it does not limit IGT Entry to reverse compression. We believe the new TPD Section A paragraph 2.4 being added to define an IGT LDZ System Entry Point should be specific to reverse compression.

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

None identified.

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

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Whilst we encourage solutions that propose to further the target towards Net Zero, we are aware that these also need to not impact on the safe operating of the Network, or potentially increase the end consumers charges, especially when the proportion of the country is in fuel poverty. Within NGNs network the way we manage pressure and capacity is carefully balanced, and additional capacity being moved between different pressure pipes, outside of our existing systems, would result in a need for manual monitoring and balancing to counter the additional risk to the network. The cost of this to the network, and as a result potentially all end consumers, would need to be taken into account and therefore any applications would need to be considered on a case-by-case basis.

Whilst we appreciate the proposers reasoning that Offtake or Entry pressure monitoring or metering can be managed as part of the NExA or the NEA, we feel that this being part of the UNC should be a fundamental requirement to ensure there is no issue with the compressor, and that the pressure entered is correct. Additionally, we believe that a combined NExA & NEA document would be more appropriate rather than two separate documents being used. This would ensure all parties were aware of the end-to-end obligations and the entire process was visible.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager
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