

Representation - Draft Modification Report UNC 0808

Reverse Compression

Responses invited by: **5pm on 10 August 2023**

To: enquiries@gasgovernance.co.uk

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

Representative:	Tom Stuart
Organisation:	Wales & West Utilities
Date of Representation:	01.08.23
Support or oppose implementation?	Support
Relevant Objective:	b) Positive d) None
Relevant Charging Methodology Objective:	c) None

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

The intention of Modification 808 was to enable the introduction of 3rd party owned within-grid Reverse Compression Assets to operate on the Distribution Network. WWU supports this modification as it delivers a workable solution and furthers the delivery of green gas into the DNO system. We propose to amend our 4B statement to describe the circumstances to which we agree to this arrangement subject to our Gas Act s9.1 obligation to develop an economical and efficient system for the transportation of gas to premises.

We believe the Modification furthers relevant objective 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.

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

There is a site on the WWU network to look to make use of this modification and we would like to see this modification implemented as soon as possible.

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

As provided in IGTAD B 3.5.2 B i the DNO may incur costs which it may have to recover from the IGT.

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

The legal text delivers a workable solution.

We have the following comments:

1. The definition of the entry point is described in the legal text as '*An IGT LDZ System Entry Point is an LDZ System Entry Point where gas can flow from an IGT System (as defined in IGTAD Section A2.1.1) into an LDZ (in which case the IGT System is a Connected Delivery System)*'.

a) We cannot find a connected delivery system in general terms, defined terms, however there is a definition of Connected Delivery Facility in TPD I1.2.1.

b) Although IGTAD B (3.5.2) An LDZ System Network Entry Agreement should be in force we would like a specific clause that refers to the IGT LDZ System Entry Point shall only be connected when it fulfils the criteria in the DNO's statement under Standard Licence Condition 4B (commonly known as the 4B statement). WWU will be amending our 4B statement to state that we will only agree to an IGT System Entry Point where we agree that this satisfies our Gas Act s9.1 obligation.

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

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

WWU has a Gas Act s9.1 obligation to develop an economical and efficient system for the transportation of gas to premises and any installation of reverse compression cannot affect that statutory obligation; therefore we will make it clear in our 4B statement that the overriding primacy of the statutory obligation and that reverse compression will only be permitted where it does not conflict with that obligation and where other measures to provide entry capacity are not sufficient.