

Representation - Draft Modification Report UNC 0842

Gas Entry onto the Total system via an Independent Gas Transporter

Responses invited by: **5pm on 26 January 2024**

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:	26 January 2024
Support or oppose implementation?	Comments
Relevant Objective:	
Relevant Charging Methodology Objective:	Not Applicable

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

Facilitating the entry of green gas into the network is a principle we actively support as it furthers the decarbonisation of the energy system and supports the UK in reaching its Net Zero targets. On the 20th of April 2023 WWU submitted an initial representation expressing our views of a preferred approach and whilst some of those views have been addressed, we believe that others are still valid. For this reason, we offer comments on the final modification.

Our initial response stated:

We realise that there may be good reasons why the producer wishes to use an IGT rather than connect directly to the DNO network; however, if that approach is taken then the IGT needs to accept and fulfil its obligations.

As the entry point will be connected to the IGT network then logically Ofgem will direct, using powers in Gas Act section 12, the IGT not the DN to measure the CV of the gas entering the network. Costs incurred in doing this will be incurred by the IGT and should be charged to the entrant appropriately. No obligations or costs should be incurred by the DNO. If the IGT would prefer the DN, or another party, to manage the entry point then this can be arranged through a bilateral contract.

We are encouraged by the inclusion of provisions within the modification to address this last point.

The Modification places an obligation on parties to engage in a tri-partite agreement. It

is important to note that this obligation relates only to the scenario described in the modification. Our initial representation stated:

We believe this type of agreement can be unnecessarily complicated and can make obligations for parties unclear.

We maintain our view that the relevant parties should be able to choose what type of agreement to engage in.

Our initial representation stated:

Our preference is that the IGT should have an entry agreement with the producer and the DNO and the IGT should also have an entry agreement with obligations suitably backed off in each. We believe this would be a better approach and makes clear that all parties are responsible for their own obligations.

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

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

The DN may be exposed to costs associated with managing the IGT system entry point if the IGT does not fulfil its obligations.

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

Yes

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

None